

# **Delivery of the Biosecurity Workforce**

Department of Agriculture, Fisheries and Forestry

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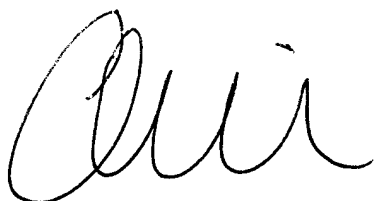
Canberra ACT  
21 May 2025

Dear President  
Dear Mr Speaker

In accordance with the authority contained in the *Auditor-General Act 1997*, I have undertaken an independent performance audit in the Department of Agriculture, Fisheries and Forestry. The report is titled *Delivery of the Biosecurity Workforce*. Pursuant to Senate Standing Order 166 relating to the presentation of documents when the Senate is not sitting, I present the report of this audit to the Parliament.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's website — <http://www.anao.gov.au>.

Yours sincerely



Dr Caralee McLiesh PSM  
Auditor-General

The Honourable the President of the Senate  
The Honourable the Speaker of the House of Representatives  
Parliament House  
Canberra ACT

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# Audit snapshot

## Auditor-General Report No.32 2024–25

### *Delivery of the Biosecurity Workforce*



#### Why did we do this audit?

- ▶ Australia is one of the few countries that remains free from some of the world's most damaging pests and diseases.
- ▶ Regulatory and workforce capability has been identified by the department as a strategic risk that has the potential to impact its ability to achieve its purposes and priorities.



#### Key facts

- ▶ The Appropriate Level of Protection for Australia is a high level of sanitary and phytosanitary protection aimed at reducing biosecurity risks to a very low level, but not to zero.
- ▶ There are five main pathways through which pests or diseases can reach Australia. These are: cargo, conveyances, international travellers, mail and natural pathways.
- ▶ As at 12 December 2024, there were 1,868 authorised biosecurity officers in the Biosecurity Operations Division and 48 authorised biosecurity officers located at the Post Entry Quarantine Facility (all divisions).



#### What did we find?

- ▶ The delivery of the biosecurity workforce is partly effective.
- ▶ The department has been partly effective in its workforce planning for the biosecurity function.
- ▶ The department has been partly effective in meeting the requirements of its biosecurity workforce plans.
- ▶ The department's monitoring and reporting of biosecurity activities and workforce is partly effective.



#### What did we recommend?

- ▶ There were seven recommendations to the Department of Agriculture, Fisheries and Forestry.
- ▶ The Department of Agriculture, Fisheries and Forestry agreed to all seven recommendations.

\$94.3 bn

Department of Agriculture, Fisheries and Forestry's forecast of the value of production in the Australian agriculture, fisheries and forestry sector in 2024–25.

16%

Biosecurity Operations Division staffing was 16 per cent below budgeted staffing levels at 30 June 2024.

# Summary and recommendations

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## Background

1. Australia's biosecurity system protects its environment, economy and way of life. Australia is one of the few countries that remain free from some of the world's most damaging pests and diseases, for example foot-and-mouth disease (FMD).<sup>1</sup> The Department of Agriculture, Fisheries and Forestry (the department) has forecast the value of production in the agriculture, fisheries and forestry sectors to reach \$94.3 billion in 2024–25.<sup>2</sup>
2. In 2021, the department (then the Department of Agriculture, Water and the Environment (DAWE)) released *Commonwealth Biosecurity 2030*, a 'strategic roadmap for protecting Australia's environment, economy, and way of life'.<sup>3</sup> The roadmap identified that the department needs a 'workforce that has the capacity, skills, and flexibility to prepare for and respond to emerging biosecurity risks, challenges, and opportunities,' and included a priority action to 'invest in a skilled and responsive workforce supported by improved regulatory tools and information.'<sup>4</sup>

## Rationale for undertaking the audit

3. Regulatory and workforce capability has been identified by the department as a strategic risk that has the potential to impact its ability to achieve its purposes and priorities.<sup>5</sup>
4. Recent reviews of the department, including by the ANAO, the Inspector-General of Biosecurity, and the Australian Public Service Commission have found weaknesses in the department's workforce planning, governance, arrangements to respond to non-compliance with biosecurity requirements, and culture.

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1 FMD is a highly contagious viral infection of cloven-hoofed mammals, including cattle, sheep, goats, pigs, deer and camels. When countries have an outbreak of FMD their livestock export products may become subject to trade bans designed to reduce the risk of transmitting the disease to livestock in other countries. The Australian Bureau of Agricultural and Resource Economics and Sciences has estimated that a large multi-state FMD outbreak has an estimated direct economic impact over 10 years of around \$80 billion (in \$2020–21 with a three per cent discount rate).

Department of Agriculture, Fisheries and Forestry (Australian Bureau of Agricultural and Resource Economics and Sciences), *Direct economic impacts of a foot-and-mouth (FMD) disease incursion in Australia, An update of ABARES 2013 estimate*, [Internet], DAFF, Canberra, 2022, available from <https://www.agriculture.gov.au/abares/research-topics/biosecurity/biosecurity-economics/fmd-update-of-2013-estimate> [accessed 18 February 2025].

2 Department of Agriculture, Fisheries and Forestry, *Second-highest year on horizon for sector* [Internet], DAFF, Canberra, 2024, available from <https://www.agriculture.gov.au/about/news/abares-december-outlook-reports> [accessed 20 February 2025].

3 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030* [Internet], DAWE, Canberra, 2021, available from <https://www.agriculture.gov.au/sites/default/files/documents/commonwealth-biosecurity-2030.pdf> [accessed 20 December 2024].

4 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030*, p. 21.

5 Department of Agriculture, Fisheries and Forestry, *Corporate Plan 2024–25* [Internet], DAFF, Canberra, 2024, p. 19, available from <https://www.agriculture.gov.au/sites/default/files/documents/daff-corporate-plan-2024-25.pdf> [accessed 21 January 2025].

5. This audit provides assurance to Parliament that the department has effective workforce planning, delivery, and oversight to deliver Australia's Appropriate Level of Protection against biosecurity import risks at the Australian border.

### **Audit objective and criteria**

6. The objective of the audit was to assess the effectiveness of the Department of Agriculture, Fisheries and Forestry's management of the biosecurity workforce.

7. To form a conclusion against the audit objective, the following criteria were adopted.

- Has the department undertaken appropriate workforce planning to deliver the biosecurity function?
- Does the department meet the requirements of its workforce plans for the biosecurity workforce?
- Has the department established effective arrangements to monitor and report on the activities and delivery of the biosecurity workforce?

### **Conclusion**

8. The department's planning and management of the biosecurity workforce is partly effective. Deficiencies in planning for and the delivery of the workforce and systemic and ongoing issues with information management compromise the department's ability to effectively manage biosecurity risks. The department is progressing workforce planning activities at the enterprise level and within Biosecurity Operations Division (BOD) and the Post Entry Quarantine Facility (PEQ). These workforce planning activities will need to be supported by monitoring and reporting arrangements that identify and allocate the workforce resources to the areas of greatest biosecurity risk; and allow for an assessment of the effectiveness of biosecurity activities.

9. The department has been partly effective in its workforce planning for the biosecurity function. A group-level tactical workforce plan was approved in October 2024 and an enterprise-wide workforce strategy was published in December 2024. These documents, when implemented, have the potential to integrate workforce planning into the department's enterprise planning framework and to align it with the department's purpose. Prior to the development of these plans, BOD undertook workforce planning activities including the development of workforce reports and an operational Workforce Strategy. The operational Workforce Strategy for BOD would benefit from the inclusion of a future state workforce design. An operational workforce plan has not been developed for PEQ. The impact of changes in biosecurity risk on workforce resource requirements are not consistently measured. The department does not have a strategy for coordinating surge support at the border. Business continuity plans for BOD have not been maintained. Business continuity plans for PEQ are published and maintained.

10. The department has been partly effective in meeting the requirements of its biosecurity workforce plans. The biosecurity workforce is below budgeted levels, driven by understaffing in BOD. The department has established mechanisms to authorise biosecurity officers under the *Biosecurity Act 2015* (the Act). The department does not have a policy that clarifies the circumstances for biosecurity officer authorisations, including when authorisation is no longer required. The department supports staff to make decisions regarding biosecurity risk through



training and the development of decision support material, and has funded projects to update decision support material. Not all instructional material used by biosecurity officers is held in the instructional material library, and 39 per cent of biosecurity-related material in the library is out of date. Staff competencies are not stored in an appropriate record-keeping system and ongoing verification of staff competencies is not part of a risk-based framework that supports divisional and enterprise learnings and continual improvement. The department does not have assurance that staff are booked to cargo inspections in accordance with their competencies.

11. The department's monitoring and reporting of biosecurity activities and workforce is partly effective. The department has systems in place that collect data on the biosecurity workforce and on the activities and delivery of the biosecurity function. Data quality issues relating to establishment and scheduling data limit the department's understanding of its resource allocation. The department is currently progressing an enterprise-level human resources data-linking project, which has the potential to provide insights into its workforce. Until there are links between resource systems and biosecurity outcomes, the department is unable to gain assurance over the effectiveness of its workforce allocations against biosecurity risks. Ongoing deficiencies in the department's record keeping impact its documentation of its business considerations and decisions, and risks the department being unable to demonstrate that staff have the competencies to undertake tasks they are assigned.

## Supporting findings

### Workforce planning for the biosecurity function

12. In October 2024 the department developed a group-level tactical workforce plan for the Biosecurity, Operations and Compliance Group. An enterprise-level workforce strategy and planning framework was published in December 2024. The governance framework over workforce planning that occurs at the group, division and team levels does not ensure that existing work is leveraged for department-wide impact and to prevent duplication of effort. BOD has developed operational and program level planning specific to its operating context. These set out activities intended to support workforce attraction, recruitment and retention. They do not describe a clear future state for the workforce in terms of identifying required staffing numbers, linked to skills and capabilities, location and strategies for delivering against surge and overtime requirements. The PEQ does not have finalised workforce plans. (See paragraphs 2.3 to 2.49)

13. The department has commenced work to develop interventions across the employment lifecycle intended to deliver a sustainable future workforce. BOD has drafted a recruitment strategy and commenced developing a capability framework. PEQ has a draft capability framework, which has not been implemented. The department does not have a strategy to meet government targets for First Nations representation in the biosecurity workforce. (See paragraphs 2.50 to 2.73)

14. The department has processes in place to consider the workforce impact of changes in risk at the border. These are not consistently applied. BOD has identified the need to formalise surge capacity and capability in executive forums. The division does not currently have a dedicated surge response for deployment during an unexpected biosecurity event. BOD undertook a review of its business continuity plans in 2022 and developed a framework and some plans as a result of the review. The plans are now out of date and have been removed from the department's

intranet. A further review and updating project is planned for 2025. PEQ has a business continuity plan that is available on the intranet. (See paragraphs 2.74 to 2.99)

### **Delivering the biosecurity workforce**

15. At June 2024, BOD was 320.9 full time equivalent staff below budgeted staffing levels. This has resulted in increased wait times for industry. At June 2024, PEQ staffing was at budgeted levels. Over 2022–23 and 2023–24, BOD and PEQ recruitment process timelines exceeded departmental policy requirements. The department has developed materials to assist staff to make biosecurity related decisions and manage biosecurity risk. Not all materials are centrally located in an approved system, and 39 per cent of biosecurity-related instructional material is out of date, creating a risk that biosecurity risk is not being effectively managed. (See paragraphs 3.3 to 3.39)

16. The department has established mechanisms to authorise biosecurity officers under the Act. The department would benefit from documentation guiding when authorisation is appropriate, when it should be maintained, and when it should be revoked. The department has identified necessary staff competencies and has developed training and competency assessment processes. Records of competency assessment are not stored in an appropriate record-keeping system and the department does not have assurance the cargo and maritime inspections scheduling system schedules inspectors according to their competencies. The process of verifying staff competencies does not ensure a risk-based approach to coverage, allow for continual improvement of processes, or provide executive oversight. (See paragraphs 3.40 to 3.112)

### **Monitoring and reporting of the activities and delivery of the biosecurity workforce**

17. The department has systems in place that collect data on the activities and delivery of the biosecurity workforce. BOD has identified deficiencies in its data governance over the collection of information into Aurion and the Scheduling and Workload Management System (SWMS). There are also deficiencies in the department's record keeping, which result in a lack of clarity over decisions taken and assurance over key processes. The inconsistent, incorrect or incomplete collection of information impedes the ability of the department to use data to understand its workforce and activities. (See paragraphs 4.3 to 4.27)

18. The department has created dashboard reports summarising biosecurity activities and the workforce. These are used by staff at all levels and in all pathways. Reports present information on the activities undertaken by the department, and its operating context. Inconsistent data collection and the absence of leakage reporting against all pathways and locations impacts the department's ability to understand and prioritise risks presented by each pathway and to allocate its workforce in response. (See paragraphs 4.28 to 4.49)

## Recommendations

### Recommendation no. 1 Paragraph 2.14

The Department of Agriculture, Fisheries and Forestry review its framework over workforce planning that occurs at the group, division and team levels to prevent duplication of effort in planning and to ensure that work that is undertaken by individual business areas is leveraged for department-wide impact.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

### Recommendation no. 2 Paragraph 2.37

The Department of Agriculture, Fisheries and Forestry:

- (a) define and endorse a future state for the biosecurity workforce in Biosecurity Operations Division and Post Entry Quarantine to manage biosecurity risk at the Appropriate Level of Protection; and
- (b) develop and report against a benefits framework for the delivery of the Workforce Strategy.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

### Recommendation no. 3 Paragraph 3.38

The Department of Agriculture, Fisheries and Forestry complete the update of decision support material, to ensure that up-to-date and authorised material is available to guide biosecurity officers in undertaking their roles in accordance with departmental policy, and apply mechanisms to provide assurance the decision support material is used.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

### Recommendation no. 4 Paragraph 3.54

The Department of Agriculture, Fisheries and Forestry improve its oversight of biosecurity officer authorisations, including by:

- (a) developing a clear policy statement regarding under which circumstances staff should be authorised as a biosecurity officer;
- (b) maintaining records that provide confidence that all biosecurity officers have completed mandatory training; and
- (c) implementing processes to identify where authorisations are no longer required and provide assurance that biosecurity officer authorisation is revoked when it is no longer required.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

**Recommendation no. 5**  
**Paragraph 3.108**

The Department of Agriculture, Fisheries and Forestry ensure staff scheduled for inspections have the appropriate competencies, and develop processes to provide assurance that staff scheduled in the Scheduling and Workload Management System (SWMS) are scheduled in accordance with their competencies.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

**Recommendation no. 6**  
**Paragraph 4.26**

The Department of Agriculture, Fisheries and Forestry review its record-keeping processes with a focus on generating and managing business information and evidence of decision-making in authorised record-keeping systems.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

**Recommendation no. 7**  
**Paragraph 4.47**

The Department of Agriculture, Fisheries and Forestry generate a framework to inform both operational workforce allocations and long-term strategic planning for workforce resource requirements, based on the impact of biosecurity operations and residual risk. This framework should:

- (a) support an understanding and assessment of the changing biosecurity risk environment;
- (b) include consistent collection of biosecurity data, across all pathways; and
- (c) link workforce allocation to risk.

**Department of Agriculture, Fisheries and Forestry response:**  
*Agreed.*

## **Summary of entity response**

19. The proposed audit report was provided to the department. The department's summary response is reproduced below. The full response from the department is at Appendix 1. Improvements observed by the ANAO over the course of this audit are listed at Appendix 2.

The Department of Agriculture, Fisheries and Forestry (the department) welcomes the findings of the ANAO and is committed to implementing the report's seven recommendations appropriately and in a timely manner.

The recommendations focus on strengthening workforce planning, resource allocation, benefits management, record keeping, and reporting. As import volumes rise and the biosecurity risk environment continues to evolve, the department recognises the critical role that these business functions play in managing biosecurity risks. The department is committed to understanding the systemic issues that could limit our effective delivery of the biosecurity workforce. The ANAO findings, therefore, provide valuable insights that

will support ongoing efforts to enhance effective and efficient management of the biosecurity workforce and regulatory capability uplift initiatives.

We will continue to improve processes that support the biosecurity workforce and broader management of biosecurity risks. Work is already underway across the department to address several elements of the recommendations and to leverage identified opportunities for improvement. The department remains committed to driving positive change through the Transformation Action Plan, other departmental strategic initiatives, and enhanced Biosecurity, Operations and Compliance Group operating models.

## Key messages from this audit for all Australian Government entities

20. Below is a summary of key messages, including instances of good practice, which have been identified in this audit and may be relevant for the operations of other Australian Government entities.

### Governance and risk management

- Effective workforce planning is integrated into regular business planning and activities and occurs at multiple levels across the business, cascading from the enterprise level to operational activities. By integrating workforce planning into business planning, entities can clearly demonstrate workforce requirements to ensure the right numbers of staff, with the right skills are in the right places at the right time to mitigate business risks and to deliver business outcomes.
- Workforce planning should be based on a mature understanding of the entities' deliverables and risk environment. This enables entities to implement operational workforce allocations, inform long-term strategic planning and demonstrate that resource allocation and re-allocation is proportionate to risk.



# Audit findings

# 1. Background

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## Introduction

1.1 Australia's biosecurity system protects its environment, economy and way of life. Australia is one of the few countries that remain free from some of the world's most damaging pests and diseases, for example foot-and-mouth disease (FMD).<sup>6</sup> The Department of Agriculture, Fisheries and Forestry (the department) has forecast the value of production in the agriculture, fisheries and forestry sectors to reach \$94.3 billion in 2024–25.<sup>7</sup>

1.2 The department is responsible for managing Australia's biosecurity risks through administering the *Biosecurity Act 2015* (the Act). Under the Act, biosecurity risk is defined as the likelihood of pests and diseases entering, establishing or spreading in Australian territory and causing harm to animal, plant and human health, the environment or the economy.<sup>8</sup> The Appropriate Level of Protection for Australia is defined by the department as a high level of sanitary and phytosanitary protection aimed at reducing biosecurity risks to a very low level, but not to zero.<sup>9</sup>

1.3 The department's objective in managing Australia's biosecurity is to 'Strengthen our national biosecurity system to provide a risk-based approach and an appropriate level of protection to Australia's people, our environment and economy.'<sup>10</sup>

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6 FMD is a highly contagious viral infection of cloven-hoofed mammals, including cattle, sheep, goats, pigs, deer and camels. When countries have an outbreak of FMD their livestock export products may become subject to trade bans designed to reduce the risk of transmitting the disease to livestock in other countries. The Australian Bureau of Agricultural and Resource Economics and Sciences has estimated that a large multi-state FMD outbreak has an estimated direct economic impact over 10 years of around \$80 billion (in \$2020–21 with a three per cent discount rate).

Department of Agriculture, Fisheries and Forestry (Australian Bureau of Agricultural and Resource Economics and Sciences), *Direct economic impacts of a foot-and-mouth (FMD) disease incursion in Australia, An update of ABARES 2013 estimate*, [Internet], DAFF, Canberra, 2022, available from <https://www.agriculture.gov.au/abares/research-topics/biosecurity/biosecurity-economics/fmd-update-of-2013-estimate> [accessed 18 February 2025].

7 Department of Agriculture, Fisheries and Forestry, *Second-highest year on horizon for sector* [Internet], DAFF, Canberra, 2024, available from <https://www.agriculture.gov.au/about/news/abares-december-outlook-reports> [accessed 20 February 2025].

8 The definition of biosecurity risk is

(a) the likelihood of a disease or pest:

(i) entering Australian territory or a part of Australian territory; or

(ii) establishing itself or spreading in Australian territory or a part of Australian territory; and

(b) the potential for any of the following:

(i) the disease or pest to cause harm to human, animal or plant health;

(ii) the disease or pest to cause harm to the environment;

(iii) economic consequences associated with the entry, establishment or spread of the disease or pest.

*Biosecurity Act 2015*, section 9, definitions.

9 *Biosecurity Act 2015*, section 5.

The department delivers some biosecurity functions in partnership with industry. Approved Arrangements allow operators to manage biosecurity risks and/or perform the documentary assessment of goods in accordance with departmental requirements, using their own sites, facilities, equipment and people, and without constant supervision by the department and with occasional compliance monitoring or auditing.

10 Department of Agriculture, Fisheries and Forestry, *Corporate Plan 2024–25* [Internet], DAFF, Canberra, 2024, p.45, available from <https://www.agriculture.gov.au/sites/default/files/documents/daff-corporate-plan-2024-25.pdf> [accessed 20 December 2024].



## Biosecurity regulation

1.4 Australia's biosecurity system consists of three focus areas for preventing or responding to the incursion of pests or diseases.

- Pre-border (overseas) activities focus on working with foreign governments and agencies, importers and other stakeholders to mitigate risk and reduce the number and frequency of exotic pests and diseases that reach Australia.
- At the border activities involve screening and inspecting conveyances<sup>11</sup>, freight, mail and passengers for biosecurity threats, as well as undertaking verification, assurance and post-entry quarantine to prevent exotic pests and diseases entering Australia.
- Post-border activities include working with the states, territories and industry partners to detect and respond to incursions; plan emergency responses; and contain and eradicate exotic pests and diseases that enter or emerge in the country.<sup>12</sup>

1.5 There are five main pathways through which pests or disease can reach Australia. These are: cargo, conveyances, international travellers, post and mail and natural pathways.<sup>13</sup>

1.6 In 2021, the department (then the Department of Agriculture, Water and the Environment (DAWE)) released *Commonwealth Biosecurity 2030* [2021], a 'strategic roadmap for protecting Australia's environment, economy, and way of life'.<sup>14</sup> The roadmap identified that the department needs a 'workforce that has the capacity, skills, and flexibility to prepare for and respond to emerging biosecurity risks, challenges, and opportunities,' and included a priority action to 'invest in a skilled and responsive workforce supported by improved regulatory tools and information.'<sup>15</sup> The roadmap was updated in October 2024 to the *DAFF Biosecurity 2030 Roadmap* 'Protecting Australia's environment, economy and way of life' (Biosecurity 2030 Roadmap, [2024]), which retained this strategic action.<sup>16</sup>

## Organisational structure

1.7 Biosecurity regulatory activities to ensure imports, conveyances and goods carried by travellers meet Australia's import requirements are delivered within the department by the

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11 *Biosecurity Act 2015*, section 16, describes a conveyance as meaning any of the following:

- a) an aircraft;
- b) a vessel;
- c) a vehicle;
- d) a train (including railway rolling stock);
- e) any other means of transport prescribed by the regulations.

12 Department of Agriculture, Fisheries and Forestry, *DAFF Biosecurity 2030 Roadmap* [Internet], DAFF, Canberra, 2024, p. 17 available <https://www.agriculture.gov.au/sites/default/files/documents/daff-biosecurity-2030-roadmap.pdf> [accessed 29 November 2024].

13 Natural pathways involve the natural environment without human involvement, such as wind and sea currents or the migration of wild birds.

Department of Agriculture, Fisheries and Forestry, *DAFF Biosecurity 2030 Roadmap*, p. 19.

14 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030* [Internet], DAWE, Canberra, 2021, available from <https://www.agriculture.gov.au/sites/default/files/documents/commonwealth-biosecurity-2030.pdf> [accessed 20 December 2024].

15 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030*, pp. 9 and 21.

16 Department of Agriculture, Fisheries and Forestry, *DAFF Biosecurity 2030 Roadmap*, p. 9.

Biosecurity Operations Division (BOD). BOD's operations include policy regulatory control setting across biosecurity risk pathways, as well as delivery of assessments, inspections, community engagement and contact centre services. BOD staff providing biosecurity operations at the border perform duties including, but not limited to:

- inspections on imported goods, ships, aircraft, animals and animal genetic material and assessment of documentation against import conditions<sup>17</sup>;
- managing goods that do not comply with import and export requirements, capturing information to support evidence-based decisions; and
- providing timely and accurate advice on biosecurity matters to stakeholders/clients and senior managers.

1.8 Where import conditions require an import be quarantined in a government facility prior to being released from biosecurity control, this is undertaken at the Australian Government's Post Entry Quarantine Facility (PEQ). At PEQ, staff work in commodities such as dogs, cats and horses as well as specialised roles in plants, avian and enabling services. Duties at PEQ include:

- undertaking inspections of plants and animals for biosecurity risks as well as general monitoring and husbandry duties; and
- performing support services including answering client phone calls, communicating via email, completing animal reservation bookings and conducting animal health certification audits.

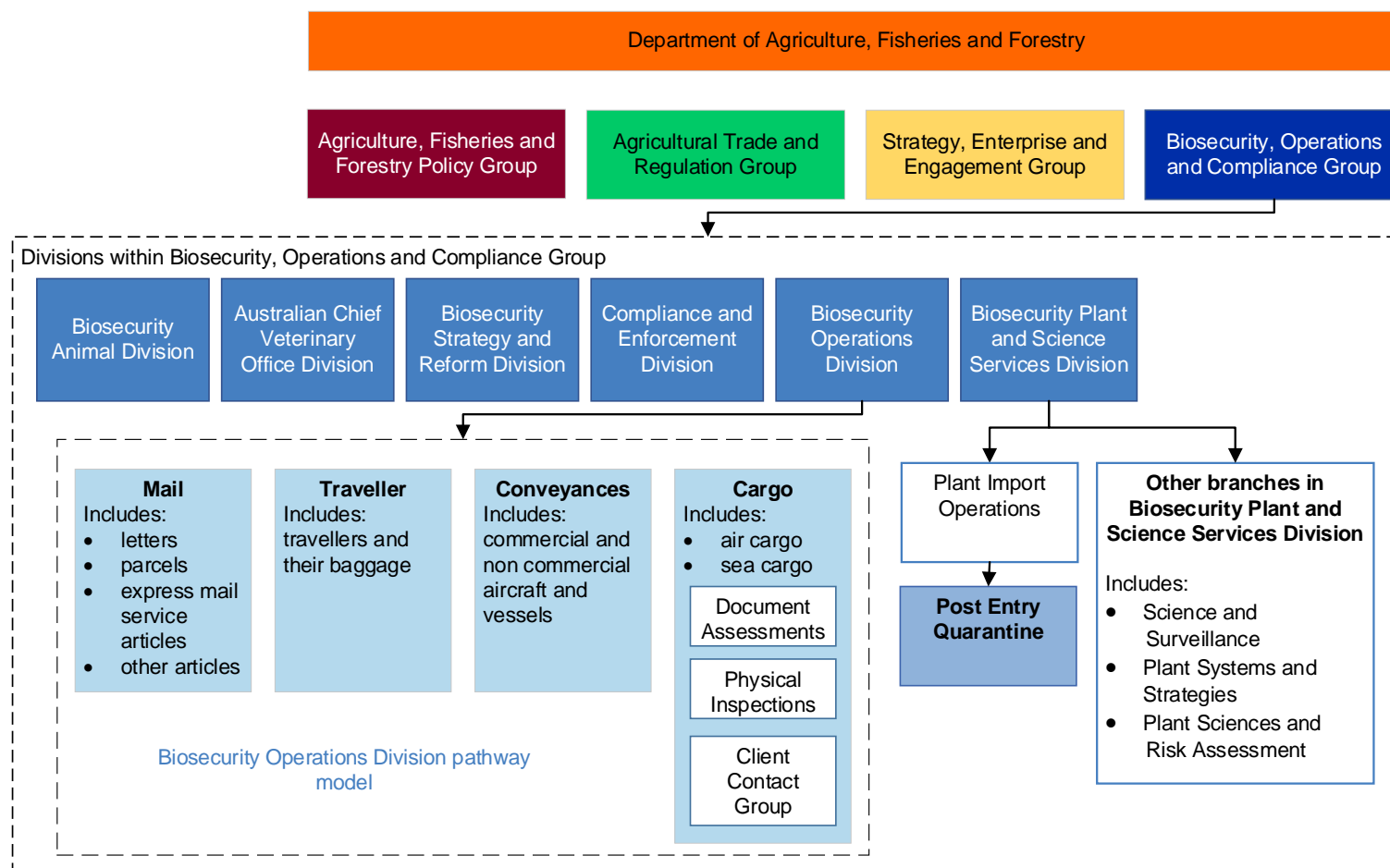
1.9 There are also other parts of the department that undertake biosecurity activities such as policy development and audit.

1.10 Prior to September 2022, PEQ was a part of BOD. In September 2022, responsibility for PEQ moved to Biosecurity Plant and Science Services Division. Both BOD and PEQ are part of the Biosecurity, Operations and Compliance Group. A diagram outlining where BOD and PEQ are positioned within the department's organisational structure, and the pathway delivery model adopted by BOD, is provided in Figure 1.1. The location of the BOD Workforce (FTE) is provided in Figure 1.2. The PEQ Facility is at Mickleham, in Victoria.

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17 These are documented in BICON — Australian Biosecurity Import Conditions (see paragraphs 3.28 to 3.31).

**Figure 1.1: Extract of the department's organisational structure (December 2024) including the Biosecurity Operations Division's pathway model**

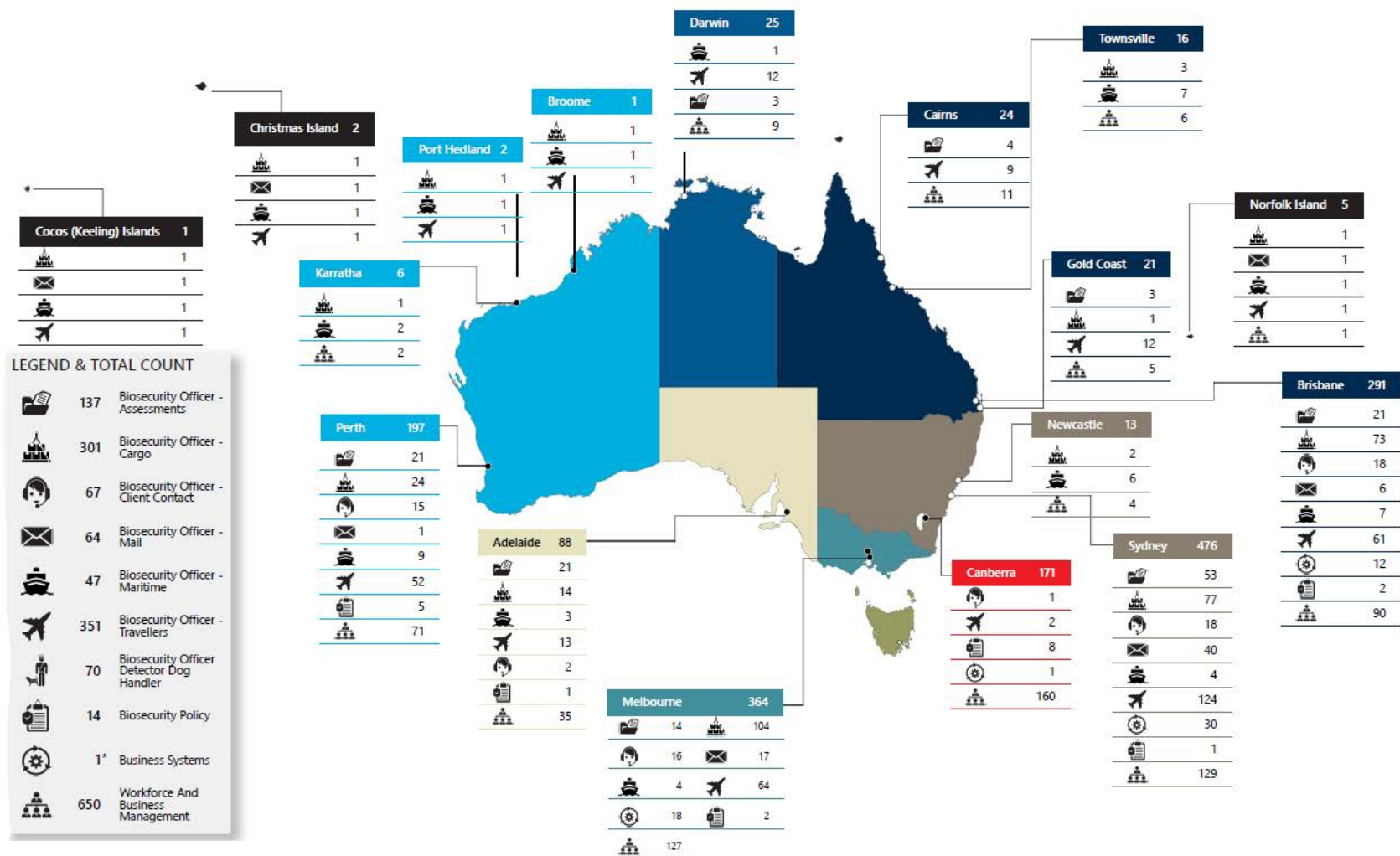


**Note:** PEQ operates as an independent branch, reporting directly to the First Assistant Secretary of the Biosecurity Plant and Science Services Division. It is included under the Plant Import Operations (PIO) branch in departmental financial systems due to Financial Management Information System (FMIS) governance arrangements, but has no reporting responsibilities to the PIO branch.

There are two conveyance sub-pathways: Aircraft and Maritime. Within BOD, Biosecurity Operations, Cargo and Conveyance Policy and Detection Capability develops the biosecurity policy for both international conveyance sub-pathways. Maritime Operations and Regulatory Capability branch manage international maritime biosecurity risks at the border and Travellers Operations manage international aircraft biosecurity risks at the border.

Source: ANAO analysis of departmental documentation.

**Figure 1.2: BOD Workforce by full-time equivalent, as at July 2024**



**Note:** Given the scale, not all locations are shown. Staff in some small offices have been grouped into larger locations. These staffing figures were determined based on cost centre year-to-date staffing levels from the department's Financial Management System data. Figures are rounded for presentation and summed for each location. This may result in a small margin of variance between totals. The Business Systems figure marked with an asterisk in the legend and total count includes leadership positions (APS5 and above) within all operational business areas.

**Source:** Departmental documentation.

## Previous reviews

1.11 Australia's approach to biosecurity management has been subject to a number of recent ANAO audits<sup>18</sup> and reviews undertaken by the Rural and Regional Affairs and Transport References Committee<sup>19</sup>, the Inspector-General of Biosecurity<sup>20</sup>, the Commonwealth Scientific and Industrial Research Organisation<sup>21</sup>, and the Australian Public Service Commission.<sup>22</sup>

1.12 A common theme identified across reviews is that improved workforce planning, delivery and review is required to ensure biosecurity management remains effective in the future.

## Rationale for undertaking the audit

1.13 Regulatory and workforce capability has been identified by the department as a strategic risk that has the potential to impact its ability to achieve its purposes and priorities.<sup>23</sup>

1.14 Recent reviews of the department, including by the ANAO, Inspector-General of Biosecurity and Australian Public Service Commission have found weaknesses in the department's workforce planning, governance, arrangements to respond to non-compliance with biosecurity requirements, and culture.

1.15 This audit provides assurance to the Parliament that the department has effective workforce planning, delivery and oversight to deliver Australia's Appropriate Level of Protection against import risks at the Australian border.

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18 Recent audits relevant to biosecurity include:

Auditor-General Report No.20 2021–22, *Human Biosecurity for International Air Travellers during COVID-19*, ANAO, Canberra, 2022, available from <https://www.anao.gov.au/work/performance-audit/human-biosecurity-international-air-travellers-during-covid-19> [accessed 15 January 2025].

Auditor-General Report No.42 2021–22 *Responding to Non-Compliance with Biosecurity Requirements*, ANAO, Canberra, 2021, available from <https://www.anao.gov.au/work/performance-audit/responding-to-non-compliance-biosecurity-requirements> [accessed 15 January 2025].

19 Rural and Regional Affairs and Transport References Committee, *Adequacy of Australia's biosecurity measures and response preparedness, in particular with respect to foot-and-mouth disease and varroa mite* [Internet], Australian Parliament, Canberra, 2022, available from [https://www.aph.gov.au/Parliamentary\\_Business/Committees/Senate/Rural\\_and\\_Regional\\_Affairs\\_and\\_Transport/FMDBiosecurity/Report](https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/FMDBiosecurity/Report) [accessed 7 November 2024].

20 Current and completed reviews from the Inspector-General of Biosecurity can be accessed via its website at <https://www.igb.gov.au/current-and-completed-reviews>.

21 Commonwealth Scientific and Industrial Research Organisation, *Australia's Biosecurity Future: Unlocking the next decade of resilience* [Internet], CSIRO, Canberra, 2022, pp. ii–iii, available from <https://www.csiro.au/en/work-with-us/services/consultancy-strategic-advice-services/csiro-futures/agriculture-and-food/biosecurity-futures> [accessed 7 November 2024].

22 Australian Public Service Commission, *Capability Review: Department of Agriculture, Fisheries and Forestry* [Internet], APSC, Canberra, 2023, available from <https://www.apsc.gov.au/initiatives-and-programs/workforce-information/research-analysis-and-publications/capability-review-program/capability-review-department-agriculture-fisheries-and-forestry> [accessed 2 October 2024].

23 Department of Agriculture, Fisheries and Forestry, *Corporate Plan 2024–25*, p. 19.

## Audit approach

### Audit objective, criteria and scope

1.16 The objective of the audit was to assess the effectiveness of the Department of Agriculture, Fisheries and Forestry's management of the biosecurity workforce.

1.17 To form a conclusion against the audit objective, the following criteria were adopted.

- Has the department undertaken appropriate workforce planning to deliver the biosecurity function?
- Does the department meet the requirements of its workforce plans for the biosecurity workforce?
- Has the department established effective arrangements to monitor and report on the activities and delivery of the biosecurity workforce?

1.18 The scope of the audit was focussed on the department's arrangements to manage the biosecurity workforce consisting of biosecurity officers<sup>24</sup>, assessment officers and client contact officers who are tasked to identify and respond to potential biosecurity risk material being imported into Australia at the border. At border activities involve managing client contact including inspections, assessing documentation, screening and inspecting conveyances, cargo, mail and goods associated with travellers for biosecurity threats, as well as undertaking verification, assurance and post entry quarantine to prevent exotic pests and diseases entering Australia.

1.19 The audit did not examine biosecurity officers authorised under the Act that are not delivering services at the border, including those that deliver policy advice, project management and services such as regulatory audits, surveillance and diagnostics and import permits, except to the extent to which these activities inform the actions of biosecurity officers conducting at border activities.

1.20 The audit scope did not include functions performed under the *Imported Food Control Act 1992*; the management of biosecurity risks presented by natural pathways; biosecurity management of exports; or biosecurity functions and staff regulating the biosecurity aspects of the traditional movement of people and trade in the Torres Strait Protected Zone, which is managed under the Biosecurity Act and Torres Strait Treaty 1985.

### Audit methodology

1.21 The audit methodology included examination of departmental documentation, policies and records, control testing of information systems, observations and meetings with departmental staff. Four contributions were made through the audit contribution facility on the ANAO website. The audit was conducted in accordance with ANAO Auditing Standards at a cost to the ANAO of approximately \$778,910.

1.22 The team members for this audit were Kate Cummins, Johanna Bradley, Marcus Newberry, Liset Campos Manrique, Jacqueline Hedditch and Corinne Horton.

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24 Defined as a person who is authorised under section 545 to be a biosecurity officer under the *Biosecurity Act 2015*, and section 9, definitions.

## 2. Workforce planning for the biosecurity function

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### Areas examined

This chapter examines whether the Department of Agriculture, Fisheries and Forestry (the department) has undertaken appropriate workforce planning to deliver the biosecurity function.

### Conclusion

The department has been partly effective in its workforce planning for the biosecurity function. A group-level tactical workforce plan was approved in October 2024 and an enterprise-wide workforce strategy was published in December 2024. These documents, when implemented, have the potential to integrate workforce planning into the department's enterprise planning framework and to align it with the department's purpose. Prior to the development of these plans, Biosecurity Operations Division (BOD) undertook workforce planning activities including the development of workforce reports and an operational Workforce Strategy. The operational Workforce Strategy for BOD would benefit from the inclusion of a future state workforce design. An operational workforce plan has not been developed for the Post Entry Quarantine Facility (PEQ). The impact of changes in biosecurity risk on workforce resource requirements are not consistently measured. The department does not have a strategy for coordinating surge support at the border. Business continuity plans for BOD have not been maintained. Business continuity plans for PEQ are published and maintained.

### Areas for improvement

The ANAO made two recommendations aimed at developing a governance framework over workforce planning that occurs at the enterprise, group, division and team levels and improving the department's understanding and documentation of its future state workforce. The ANAO identified two opportunities for improvement related to: formalising leave planning processes, including documenting operational requirements and assessment criteria for the consideration of leave applications during peak periods; and undertaking additional data collection and analysis over continuous workforce planning.

2.1 Workforce planning is the 'repeated, systematic and cyclical identification, analysis and planning of organisational needs in terms of people'.<sup>25</sup> It is a key component of business planning and helps to ensure that organisations have the right resources to achieve their organisational strategy, as well as an ongoing process of generating insights into current and future workforce needs and risks arising from workforce capacity or capability gaps.<sup>26</sup>

2.2 This chapter considers workforce planning undertaken by the department in the enterprise, BOD and PEQ contexts, including the development of supporting policies and procedures.

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25 International Standards Organisation, *Human Resource Management — Workforce Planning, ISO 30409: 2016*, p. 1, referenced in the Australian Public Service Commission, *Workforce Planning Guide*, APSC, Canberra, 2023, p. 3, available from <https://www.apsc.gov.au/sites/default/files/2023-04/APS%20Centre%20of%20Excellence%20-%20Workforce%20Planning%20Guide%20-%20Accessibility.pdf> [accessed 6 November 2024].

26 Australian Public Service Commission, *Workforce Planning Guide*, p. 3.



## Has the department developed workforce plans to deliver the biosecurity workforce aligned with the department’s purpose?

In October 2024, the department developed a group-level tactical workforce plan for the Biosecurity, Operations and Compliance Group. An enterprise-level workforce strategy and planning framework was published in December 2024. The governance framework over workforce planning that occurs at the group, division and team levels does not ensure that existing work is leveraged for department-wide impact and to prevent duplication of effort. BOD has developed operational and program level planning specific to its operating context. These set out activities intended to support workforce attraction, recruitment and retention. They do not describe a clear future state for the workforce in terms of identifying required staffing numbers, linked to skills and capabilities, location and strategies for delivering against surge and overtime requirements. The PEQ does not have finalised workforce plans.

2.3 The APS Workforce Planning Guide describes four different types of workforce planning: strategic, business, operational, and project or program management. These are outlined in Figure 2.1.<sup>27</sup>

**Figure 2.1: Types of workforce planning described in the APSC Workforce Planning Guide**



Source: Adapted from Australian Public Service Commission, *Workforce Planning Guide*, p. 7.

### Strategic workforce plans

2.4 In the 2023 Australian Public Service Commission (APSC) Capability Review of the department, the APSC identified developing and embedding a workforce planning framework including an effective strategic workforce plan as a priority area for capability improvement.<sup>28</sup> The report stated that the department ‘needs a comprehensive and adaptive workforce strategy that

<sup>27</sup> *ibid.*, p. 7.

<sup>28</sup> Australian Public Service Commission, *Capability Review: Department of Agriculture, Fisheries and Forestry* [Internet], APSC, Canberra, 2023, p. 19, available from <https://www.apsc.gov.au/initiatives-and-programs/workforce-information/research-analysis-and-publications/capability-review-program/capability-review-department-agriculture-fisheries-and-forestry> [accessed 2 October 2024].



identifies skills and capabilities required to ensure its workforce is fit for future purpose'.<sup>29</sup> As a priority, the APSC recommended that the development of the strategic workforce plan should be an area of consideration and focus over the following six months.<sup>30</sup>

2.5 The department responded to the APSC recommendation by developing an overarching Transformation Action Plan (TAP) (published on 1 December 2023), which included a strategic workforce framework as one of its deliverables.<sup>31</sup> The TAP Program Framework was considered by the Transformation Steering Committee at its meeting of 30 January 2024 and approved on 18 March 2024, with a plan for the workforce planning project approved on 27 March 2024.<sup>32</sup> Table 2.1 outlines the approved milestones and delivery dates for the workforce planning project, including the milestone delivery status as at March–April 2025.

**Table 2.1: Milestones and delivery dates for the workforce planning project**

Workforce planning project		
Milestone	Planned delivery date	Status at March–April 2025
1. Group level tactical workforce plans forecasting workforce capacity and capability needs for each group over the next 12–18 months.	September 2024	Delivered. The Biosecurity, Operations and Compliance Group Tactical Workforce Plan was approved by the Deputy Secretary on 29 October 2024.
2. Develop a strategic workforce plan.	September 2024	Delivered. The Workforce Strategy 2024–2027 was published on the department's intranet 11 December 2024.
3. A workforce planning framework that enables and supports workforce planning at all levels across the department.	September 2024	Delivered. The framework was published on the department's intranet 11 December 2024.
4. Manager capability uplift implementation plan	September 2024	Partly delivered. The department has developed a Manager and Leaders' Workforce Strategy and Tactical Plan Implementation Guide. This was developed as a guiding document for managers and has not been endorsed formally through a committee. As at 1 April 2025, this has not been released to managers across the

29 *ibid.*, p. 18.

30 *ibid.*, p. 3.

31 The Transformation Action Plan identifies the actions the department intends to take to uplift leadership and culture, collaboration, delivery, people and resourcing and risk capabilities. The department's action plan was published on 1 December 2023. Department of Agriculture, Fisheries and Forestry, *Transformation Action Plan* [Internet], DAFF, Canberra, 2023, available from <https://www.agriculture.gov.au/about/reporting/transformation-action-plan> [accessed 25 November 2024].

32 Under the Transformation Program Framework, the Transformation Action Plan Steering Committee is responsible for overseeing the program, providing advice and direction, resolving problems across initiatives and contributing to making informed decisions. The Steering Committee also has authority to make recommendations to the Executive Board, and the Finance and Performance Committee where necessary, for resourcing during the life of the Transformation Taskforce. The Transformation Action Plan Steering Committee is reported to through a monthly program status report from the Transformation Taskforce Working Group, and provides a quarterly program status report to the department's executive board.

Workforce planning project		
Milestone	Planned delivery date	Status at March–April 2025
		department. The department has also developed a Maturity Roadmap that will support the implementation of the strategy and framework, outlining activities through to 2029 that are intended increase departmental workforce planning maturity.
5. Workforce planning data needs analysis, identifying immediate and long-term information and data gaps impacting workforce planning maturity.	December 2024	On 17 March 2025, the department advised the ANAO that the delivery of this outcome was delayed to May 2025, to align with a data discovery exercise that is underway through the Workforce Reporting Project, see paragraph 4.7.
6. Workforce planning report/dashboard	June 2025	Workforce planning data has been incorporated into existing workforce dashboards (see also paragraph 4.32). On 9 January 2025 the department advised the ANAO that it expects to continue to iterate these dashboards based on outcomes of the data needs analysis under milestone 5.
7. Enterprise planning processes and templates (e.g. business planning, internal and external budget processes) are updated to include workforce planning.	June 2025	On 17 March 2025 the department advised that planning for the 2025 Divisional Workforce Action Plan process was underway. The department expects division-level workforce planning templates to be available by June 2025, and that the first iteration revised division plans will be completed by September 2025 in line with broader business planning.
8. Workforce planning data from business and budget planning activities is incorporated into workforce planning reports and insights.	June 2025	On 9 January 2025, the department advised the ANAO that while the current SES workforce reports use Aurion <sup>a</sup> data, future iterations are expected to integrate additional data sources including finance, learning and development, and recruitment metrics (see also paragraph 4.6).

Note a: Aurion is the department's Human Resources Information System.

Source: ANAO analysis of departmental documentation.

2.6 On 11 December 2024, the department published its Workforce Strategy 2024–27 (the strategy) and workforce planning framework on its intranet. These documents are aligned to the department's purposes. Key documents such as those intended to establish departmental culture have been integrated into the workforce planning framework.

2.7 The strategy identifies priority workforce capabilities — those capabilities that have been identified by two or more groups as experiencing current gaps requiring 'prioritisation and capability uplift'. The identification of how to build these capabilities is delegated to the group level tactical plan. The strategy includes enterprise strategic initiatives related to: identifying the future workforce; proactively attracting, developing and retaining the workforce; adopting a resilient and

adaptive workforce design; and cultivating an inclusive workforce that are expected to be delivered through the strategy.

2.8 The 'People Vision' included in the document states that 'through this Workforce Strategy, we will see improvements in key areas of the [Australian Public Service] employee census, including engagement, the implementation of people initiatives tailored to the department's needs, accessible leadership development opportunities for all employees, and increased retention.' The strategy does not identify quantitative and qualitative measures for success against the outcomes and expected improvements outlined.

2.9 The workforce planning framework provides a commitment for workforce planning experts within the corporate services area to support business areas within the department to undertake planning. This includes being a trusted advisor, 'providing insights and forging connection between business areas and other corporate functions of the department in support of workforce planning activities.' Under this framework, groups and divisions are accountable for the implementation of their tactical workforce plans and actions, and workforce risks are owned and managed by the group or division executive who may establish their own internal risk management and reporting processes if needed. There are no statements in the document regarding how the department intends to prevent the duplication of activities across work groups, and improve the reuse and leveraging of work done within other areas of the department.

2.10 The strategy states that successful delivery of the framework will be evaluated through 'monitoring the effectiveness of our Strategic Initiatives Plan through our People and Culture Committee, adjusting our approach as needed to ensure our priority workforce risks are effectively mitigated; and effective implementation of our Workforce Planning Framework, including embedding workforce planning into our enterprise planning practices (budget, business and risk) and decision-making activities.' The department advised the ANAO on 9 December 2024 that reporting to the People and Culture committee is expected to occur twice a year, coordinated by the Workforce Strategy, Planning and Design Team in the People, Property and Security Division. The first meeting of the People and Culture Committee (PCC) was held on 12 September 2024.

#### *Group level tactical workforce plan*

2.11 The development of group level tactical plans was a milestone in the workforce planning project under the TAP (see Table 2.1). The Biosecurity, Operations and Compliance Group (BOCG) tactical plan was approved on 29 October 2024.<sup>33</sup> The BOCG tactical plan was accompanied by a transition package to support the group-level implementation of the plan.

2.12 The group level tactical plan does not reference or acknowledge the workforce planning already undertaken by BOD or recognise implementation of BOD planning (see paragraphs 2.22 to 2.34). Of the 10 initiatives across four themes identified by the tactical plan, nine duplicate corresponding work already identified and progressed through the BOD Workforce Strategy [2024].

2.13 Given its group level focus, the tactical plan has a wider remit than the BOD Workforce Strategy [2024]. There would be merit in recognising where work in this area is progressed within

33 The plan was developed in consultation with the Biosecurity, Operations and Compliance Group Executive by the Workforce Strategy, Planning and Design (WSPD) team, People, Property and Security Division with support from external consultants, Tailored HR solutions (THRS).  
AusTender Contract Notice CN4031049-A1 (Tailored HR solutions (THRS)). Contract value (including amendment): \$261,695.00.

the division, to support leveraging of work already commenced or completed, and the identification of lessons learned by BOD for use by the group and department more broadly.

### Recommendation no. 1

2.14 The Department of Agriculture, Fisheries and Forestry review its framework over workforce planning that occurs at the group, division and team levels to prevent duplication of effort in planning and to ensure that work that is undertaken by individual business areas is leveraged for department-wide impact.

**Department of Agriculture, Fisheries and Forestry response:** *Agreed.*

2.15 *The department's foundational workforce planning documents will be used to prioritise and deliver an enterprise approach to workforce planning across the department. The use of centralised HR functions and systems will streamline process, reduce workforce risks and improve compliance with relevant legislation such as WHS, as well as enable greater strategic alignment for training, talent management, retention and employee experience.*

### Business level planning

2.16 Business level workforce planning requires the identification of workforce capabilities to deliver on key business and financial outcomes. The integration of workforce planning into business planning processes ensures workforce planning is directly and immediately supporting business deliverables and helps mitigate business risks.<sup>34</sup>

2.17 Business planning should consider workforce risks, and these risks should be reviewed as part of the implementation monitoring and reporting process, to determine if the risks have changed over the course of the reporting period. Where new, significant strategic or operational workforce risks have been identified through the workforce planning exercise, these risks and the identified controls, should be reflected in the organisation's strategic and operational risk registers (as applicable), for focussed monitoring as part of whole of organisation risk processes.<sup>35</sup>

2.18 The Workforce Strategy 2024–27 and Workforce Planning Framework describe how workforce planning will be integrated into the department's business planning, including an intention for stronger integration of workforce and people risk into business planning, and budget planning.

2.19 The department integrates workforce risk into existing business planning for both BOD and PEQ.

2.20 Reporting on workforce risks and outcomes for both BOD and PEQ does not include an assessment of control performance against divisional risks. Reporting includes some definitions against effectiveness in a narrative form and does not provide measurements against pre-defined and expected impacts and benefits of the identified risk mitigation strategies.

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34 Australian Public Service Commission, *APSC Workforce Planning Guide*, p. 6.

35 *ibid.*, p. 28.

## Operational workforce planning

### *BOD operational workforce planning*

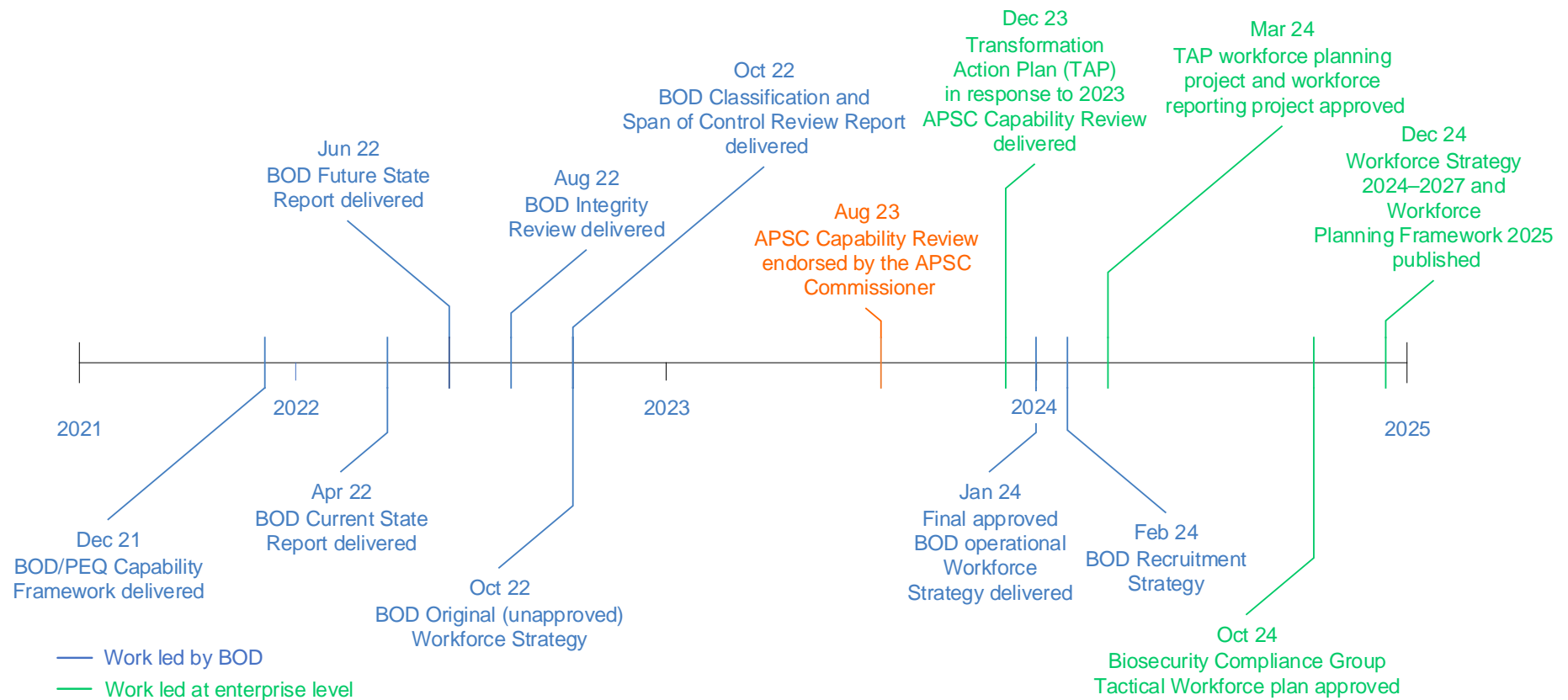
2.21 Operational workforce plans are focussed on workforce interventions across all aspects of the employee lifecycle which are required to be delivered over the planning period.<sup>36</sup> Operational workforce planning typically covers 12 to 18 months and identifies actionable strategies to address specific workforce gaps in the short to medium term.<sup>37</sup> Figure 2.2 provides a timeline of operational workforce planning conducted for the biosecurity function.

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36 *ibid.*, p. 6.

37 *ibid.*, pp. 7 and 39.

**Figure 2.2: Timeline of biosecurity operational workforce planning activities**



Source: ANAO analysis of departmental documentation.

### *BOD strategic workforce planning reviews*

2.22 In December 2021, BOD engaged Deloitte Touche Tohmatsu (Deloitte) to undertake control testing, risk and vulnerability assessment and workforce capability analysis, focussed on the (then) Cargo Operations (NSW, QLD, NT, ACT) and Regulatory Assurance Branch.<sup>38</sup> Three reports were provided to the department in August 2022. The review undertaken by Deloitte built on a 2019 integrity review undertaken by Protiviti.<sup>39</sup>

2.23 The workforce capability analysis report considered team structures, training, and previous reviews to develop a current state view of the Cargo Operations (NSW, QLD, NT, ACT) and Regulatory Assurance Branch's workforce, structure and capabilities. It noted that recommendations from previous integrity reviews had not been implemented and that fraud, corruption and conduct investigations had increased, despite previous reviews and development of integrity action plans.

2.24 It made five observations and 20 recommendations to support workforce development, uplift capability and reduce integrity risks.

2.25 On 19 June 2023, the First Assistant Secretary BOD noted the outcomes of the review and agreed to consider its outcomes and recommendations in the context of divisional priorities for 2023–24, and in consultation with the People, Property and Security Division.

2.26 In 2022, BOD engaged Synergy Group to support its strategic workforce planning through the development of a:

- Current State Report — intended to provide a current state view of the division's workforce challenges and opportunities;
- Future State Report — intended to provide internal and external labour market supply and demand analysis to identify future workforce needs and considerations; and
- Workforce Strategy — intended to identify the divisional workforce requirements over the short to medium term (2022–2025) and the strategies required to deliver them.<sup>40</sup>

2.27 Concurrently, the department also engaged Synergy Group to assess the work value of APS3 to APS6 roles in BOD to provide recommendations on an appropriate span of control for the APS5 and APS6 workforce. This review was conducted in two phases; the first phase reviewed the Biosecurity Officer Inspector roles across all operational pathways and the second phase of the review examined the Client Contact Group and Assessments workstreams.

2.28 The Current State Report, Future State Report and Workforce Strategy were delivered between April and October 2022. On 20 June 2024, the department advised the ANAO that these

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38 AusTender Contract Notice CN3835288-A1 (Deloitte Touche Tomatsu). Including variation, contract value of \$496,900.00.

39 The Protiviti review made 13 recommendations including improving the design effectiveness of controls in relation to the security vetting of BOD staff, improving integrity training and awareness and improving system access controls. On 19 December 2024, the department stated that following Protiviti's review, BOD developed an Outcome Action Plan. Of the 13 recommendations six were either fully or partially implemented prior to the Departmental machinery of government changes in February 2020, and a Divisional restructure in May 2021.

AusTender Contract Notice CN3631129 (Protiviti Pty Limited). Contract value of \$62,803.00.

40 AusTender Contract Notice CN3849597-A1-3 (Synergy) including variations 1–3, contract value of \$747,222.00.

reports were accepted by the Assistant Secretary Maritime Operations and Regulatory Capability. They were not endorsed or approved by the Biosecurity Operations Division Executive Committee (BODEx).<sup>41</sup> As at 12 June 2024, the Current State Review was watermarked ‘Draft’, and the Workforce Strategy [2022] is marked ‘Final draft.’

2.29 On 8 November 2022, the First Assistant Secretary BOD provided drafts of these reports to the department’s Chief People Officer, drawing attention to several aspects of the plans that they considered may have been relevant to other people and capability initiatives at the enterprise level, including the workforce structure, enterprise agreement negotiations, capability framework and learning pathways, and leadership capability uplift. During the development and consultation regarding the BOD Workforce Strategy, internal discussion noted a potential for greater clarity in the relative responsibilities for workforce planning at the enterprise and divisional level, and the opportunities to better leverage and integrate the division’s workforce planning and enterprise level initiatives (such as learning and development).

2.30 On 18 August 2023, the First Assistant Secretary BOD noted the work undertaken by Synergy in 2022; approved the initiatives that should form part of the BOD Workforce Strategy, removing those that overlapped with enterprise-level workforce management responsibilities; and approved revision of the strategy to give effect to these decisions. The strategy was completed in January 2024, with approvals for individual initiatives outlined in the strategy to be progressed through BODEx.

2.31 Initiatives identified in the BOD Workforce Strategy [2024] are outlined in Table 2.2. As at December 2024, one has been paused, one is awaiting senior executive feedback, one is awaiting feedback from TAP activities, and other initiatives are progressing or implemented with ongoing delivery (for example communications occurring regularly through an updated intranet).

**Table 2.2: BOD Workforce Strategy [2024] initiatives (including implementation status as at 19 December 2024)**

Initiative	Timeframe	Status as at December 2024
People initiatives		
1.1 Wellbeing audit	6 months	Paused. See paragraph 2.62.
1.2 Reward and recognition	1–1.5 years	In progress. Awaiting SES feedback.
1.3 BOD communication strategy	6 months	In progress. Ongoing delivery.

41 The Biosecurity Operations Division Executive Committee (BODEx) is responsible for:

- setting, and overseeing the implementation of BOD’s Operating Model and alignment with the department’s strategic priorities and direction.
- the delivery of effective governance, operations and use of resources (financial and non-financial).
- shaping culture and building a shared understanding of policy, regulatory and delivery priorities.
- monitoring progress and performance of major projects, change, innovation and strategic priorities impacting the division.
- ensuring a safe working environment, including effective management of health and safety risks.
- overseeing arrangements designed to ensure that biosecurity operations staff operate with integrity.
- monitoring divisional business and operational performance.
- providing advice and assurance to department committees and the Executive Board as required.



Initiative	Timeframe	Status as at December 2024
1.4 BOD uniform	1 year	In progress. On 19 December 2024 the department advised the ANAO that the proposed uniform was trialled November 2024. Manufacturing is underway with projected delivery mid/late May 2025.
1.5 Recruitment strategy	1 year	In progress.
1.6 Workforce supply and demand modelling	1 year	In progress. On 19 December 2024 the department advised the ANAO that a capacity planning project has received business operations feedback and is in the final testing and validation phase for the workload and capacity forecasts. It stated that the team is on track for mid-late January 2025 implementation for cargo inspections.
<b>Capability</b>		
2.1 Learning and development strategy	3 years	Not yet started. On 19 December 2024 the department advised the ANAO that this strategy was to be commenced once enterprise level training has been finalised through the TAP. Paragraphs 2.63 to 2.66 to and 3.56 to 3.67 describe learning and training currently in place.
2.2 Capability framework and learning pathways	1 year	In progress, expected delivery December 2025.
2.3 Leadership capability uplift	1.5–2 years	In progress. Between July 2022 and December 2024 through the Biosecurity Training Centre (See paragraphs 3.56 to 3.67) the department delivered 21 leadership courses (277 attendees). This is in addition to non-Biosecurity Training Center (BTC) lead coaching support and training, and leadership training (7 courses and 132 attendees).
<b>Organisational architecture</b>		
3.1 Pathway model review	6 months	Not yet started. There has been no formal review, however, on 19 December 2024 the department advised the ANAO that the model has been subject to ongoing evolution and subsequent organisational adjustments.
3.2 Workforce planning and workforce management roles	1.5–2 years	Delivered.
3.3 Human resources data cleanse	6 months	In progress. The initial data cleanse was conducted. On 19 December 2024, the department advised the ANAO that establishment structure is continuously reviewed as a business-as-usual process (see also paragraphs 4.17 to 4.18).

Initiative	Timeframe	Status as at December 2024
3.4 Western Sydney Airport workforce plan and implementation	3–4 years	In progress. This work is underway and Western Sydney Airport is expected to be operational at the end of 2026.

Note: The timeframe is taken from the January 2024 Workforce Strategy.

Source: ANAO analysis of departmental documentation.

2.32 As at November 2024, the BOD operational Workforce Strategy [2024] was focussed on the development of outputs intended to improve the attraction and retention of staff. It did not include a clear outline of the proposed future state of the workforce, in terms of the optimal number, employment make-up (ongoing, non-ongoing and contingent workforce), location or capabilities of operational biosecurity officers to support the biosecurity function.<sup>42</sup>

2.33 The strategy included identification of expected benefits related to each output, including identification of risks should they not be pursued. The plan did not provide quantifiable metrics regarding the expected benefits that are to be achieved through the delivery of the plan.

2.34 The absence of a target workforce and benefit metrics means that reporting against the delivery of the BOD Workforce Strategy [2024] is limited in scope to the delivery of the individual initiatives and does not provide management with an ability to monitor and evaluate the overall impact to organisational capability through the delivery of the plan.

#### *Post Entry Quarantine operational workforce planning*

2.35 PEQ does not have a workforce plan. PEQ was initially incorporated in the work undertaken by Synergy Group (see paragraph 2.26), however responsibility for PEQ had left the division prior to the finalisation of the BOD Workforce Strategy [2024]. In the absence of a workforce plan, PEQ has a draft set of workforce management principles to manage workforce planning at the program level.

2.36 In August 2024, PEQ tasked an EL2 officer to deliver a 10-year strategy, which is intended to cover workforce, training, property, sustainable funding, and a systems review. On 9 December 2024 the First Assistant Secretary Biosecurity Plant and Science Services Division endorsed a high-level roadmap to support development of this strategy. On 17 March 2025, the department advised the ANAO that the project plan and engagement strategy was drafted and pending consideration by the PEQ Governance committee, with a final approval to be sought from the First Assistant Secretary Biosecurity Plant and Science Services Division.

## **Recommendation no. 2**

2.37 The Department of Agriculture, Fisheries and Forestry:

- (a) define and endorse a future state for the biosecurity workforce in Biosecurity Operations Division and Post Entry Quarantine to manage biosecurity risk at the Appropriate Level of Protection; and

<sup>42</sup> The BOD Workforce Strategy [2024] identified that the workforce supply and demand modelling project will enable utilisation of historic data in combination with volumetric modelling to inform future workforce demand modelling. However, this requirement extends beyond the modelling of supply and demand to include other factors such as capability and employment type.

- (b) develop and report against a benefits framework for the delivery of the Workforce Strategy.

**Department of Agriculture, Fisheries and Forestry response: Agreed.**

2.38 *The department will develop a future state for the biosecurity workforce in Biosecurity Operations Division and Post Entry Quarantine in line with the National Biosecurity Strategy (NBS) and DAFF's Biosecurity 2030 Roadmap. Development of this future state will leverage the DAFF Workforce Strategy, DAFF Workforce Planning Framework and BOCG Tactical Workforce Plan. The workforce planning tools and resources require business areas to identify workforce risks and strategies to mitigate them, aligned to the departmental risk management framework.*

## Program management workforce planning

2.39 Program management workforce planning helps to identify responses to specific changes in the business and show the workforce transition for that change. These have a time horizon of six to 12 months.<sup>43</sup>

2.40 Program management workforce planning considers within-year planning, including planning for work fluctuations throughout the year (see Figure 2.1). Staff scheduling is considered in paragraphs 3.98 to 3.112 of this report.

### *Work fluctuations*

2.41 The department has identified that its workforce faces fluctuations in demand, with peak periods occurring at different times in different pathways. Planning for fluctuations in demand and supply over the year supports workforce management, including developing strategies that ensure sufficient staff are available during elevated work periods, and to prevent underutilisation of staff in lower work periods.

2.42 A project to complete national benchmarking of utilisation and performance of staff resources to understand deployment was identified as a performance measure in the 2020–21 BOD Operational Business Plan. This project was not completed. An opportunity to mature workforce demand forecasting was identified in the Future State Report [2022]. At that time it was stated that ‘BOD does not have enough staff to undertake work in this area.’

2.43 A capacity planning project to analyse workloads and resource capacity for operational groups was identified as a priority in the 2023–24 BOD Divisional priorities. This project was described as a proof of concept for capacity planning, to establish a workload forecasting and capacity planning capability for BOD, to enable it to predict operational workload volumes and identify resource demand and shortfalls. This project was intended to inform workforce planning including recruitment and training. On 17 March 2025, the department advised the ANAO that a proof-of-concept plan for one pathway (Cargo Inspections) had been delivered, and that the project was now expanding the forecasting function to other operational areas.

2.44 Outside this project, BOD does not have a plan that maps fluctuations in workforce demand and supply over the year for the division. At the branch level, one location within one pathway maintained calendars demonstrating how demand drivers such as holiday periods, and seasonal fruit or flower importations impact workforce demand over the year, to assist planning workforce

43 Australian Public Service Commission, *APSC Workforce Planning Guide*, p. 7.

and skill requirements. The conveyance pathway has a decision tree to guide intervention based on the biosecurity risk and compliance history of a vessel, which is used to support resource allocation. No other branch has conducted analysis of anticipated demand for their services which was linked to operational workforce planning that identified staff numbers, skills and location.

2.45 The cargo pathway undertakes ongoing ‘change implementation planning’, which is a monthly planning process that provides visibility of changes impacting operations including the impact of workforce changes, training, peak work periods, and technology implementations. This is used to support discussions of sequencing of the changes. The conveyance pathway commenced two-monthly change implementation planning in November 2024. Other pathways do not have a system of ongoing change implementation planning, but may develop plans on an ad hoc basis, or to support major or competing changes.

2.46 PEQ uses spreadsheets to map staffing requirements over an extended planning horizon of more than six months. This is based on bookings (cats, dogs and avian) and historical use information.

### *Leave planning*

2.47 Most BOD teams<sup>44</sup> have leave planning arrangements over peak periods, based on expressions of interest, which were considered based on operational need, equity and fairness, and managed at a local level. One area (Queensland Inspections team) in BOD had a policy for the management of staff during peak periods. It defined peak periods and restrictions on leave during this time, included high-level statements regarding the process for assessing leave applications including a dispute resolution process. This policy was last updated in 2019 and reflects a different staffing model to that which is currently in place.

2.48 Work modifications may be implemented during peak periods to reduce pressure on staff. These include an embargo or reduction in training activities; limited internal and external stakeholder visits; reduced times for formal team meetings and an increase in ‘stand-up’ meetings during shift; increased overtime; increased frontline work by both team leaders and staff; and a reduction in verification processes.

### **Opportunity for improvement**

2.49 The department could formalise the process for leave planning during peak periods, including developing a policy that outlines operational requirements, to provide increased consistency and transparency of the assessment criteria to be used in the consideration of leave requests over these periods.

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44 In this context a team is a group of workers allocated to a pathway at a location.

## Do the department's workforce plans include a strategy to deliver a sustainable future workforce?

The department has commenced work to develop interventions across the employment lifecycle intended to deliver a sustainable future workforce. BOD has drafted a recruitment strategy and commenced developing a capability framework. PEQ has a draft capability framework, which has not been implemented. The department does not have a strategy to meet government targets for First Nations representation in the biosecurity workforce.

2.50 'Workforce planning, as an ongoing process of workforce alignment, reflects workforce management interventions throughout the entire employee lifecycle'.<sup>45</sup> In its response to the 2023 APSC Capability Review, the department committed to the priority action of:

develop[ing] a strategic workforce framework to build a fit-for-future workforce and support the attraction, development and retention of staff with critical skills. The framework will include actions that focus on exceeding the government's commitment to 5% First Nations representation.<sup>46</sup>

### Attraction and recruitment

2.51 The Australian Public Service (APS) Workforce Strategy 2025 states that, 'in a competitive labour market, the APS needs best-practice approaches to recruitment, leveraging technology and innovation to attract and recruit high-performing, skilled employees at all stages of their careers.'<sup>47</sup>

2.52 The 2022 Current State Report (see paragraph 2.26) identified that an environment of low unemployment rates and a competitive job market had contributed to BOD being unable to attract quality talent quickly enough to sustain the workforce. On 14 June 2024, the department advised the ANAO that on engagement, biosecurity officers require approximately six months of foundational training and workplace coaching including the acquisition of relevant job cards. This impacts the timeframes for staff delivery (see paragraph 3.73).

2.53 BOD has drafted a recruitment strategy and supporting recruitment plan which is intended to focus on near-term tasks with a 12-month timeframe.

2.54 The draft recruitment strategy is dated February 2024 and was considered by BODEx in its February 2024 meeting, however it was not endorsed. The draft recruitment strategy is intended to support the BOD Workforce Strategy [2024] (see paragraph 2.31) and position the division to attract, retain, and sustain a capable workforce and work towards becoming an employer of choice. It is underpinned by the requirement to ensure the division is employing, retaining, and managing staff within the authorised establishment (budget) of the division.

2.55 Key elements of the draft recruitment strategy include to:

- analyse workforce needs, based on performance indicators such as commencement and separations rates to forecast the future state of the workforce;

<sup>45</sup> Australian Public Service Commission, *Workforce Planning Guide*, p. 6.

<sup>46</sup> Department of Agriculture, Fisheries and Forestry, *Transformation Action Plan*, p. 7.

<sup>47</sup> Australian Public Service Commission, *Delivering for Tomorrow: APS Workforce Strategy 2025* [Internet], APSC, Canberra, 2021, p. 21, available from [https://www.apsc.gov.au/sites/default/files/2021-03/APS\\_Workforce\\_strategy.pdf](https://www.apsc.gov.au/sites/default/files/2021-03/APS_Workforce_strategy.pdf) [accessed 18 November 2024].

- develop appealing job descriptions, to reflect the culture, values, benefits and the contemporary realities of the job to attract the right candidates;
- promote the department's benefits and conditions, including highlighting career progression and showcasing BOD's value to the community; and
- monitor and evaluate the recruitment process.

2.56 As at October 2024, the draft recruitment strategy was being implemented. The department advised the ANAO on 28 October 2024 that delivery of the draft recruitment strategy is supported by weekly meetings between the BOD workforce and recruitment planning team, the technical training team and the Biosecurity Foundations Program (BFP) to plan for the onboarding of staff and to build a training and induction schedule for each cohort. Outcomes of weekly meetings are captured in a shared recruitment planning spreadsheet.

2.57 BOD has determined that to be fully staffed, accounting for vacancies and attrition, it should recruit an additional 449 staff during 2024–25. BOD plans to achieve this target by undertaking recruitment for biosecurity officers at least nine times over a 12-month period starting in August 2024; with expected onboarding of between 50 and 70 full time equivalent (FTE) staff each month.<sup>48</sup>

2.58 At the September 2024 meeting, BODEx was advised of flow on impacts due to this significant recruitment requirement including on the: ability to supply training to new recruits, given limitations on the number of training places available per month (40); the need for additional schedulers and trainers; the impact on staff who are required to provide probation reports for new staff, and for coaches who are required to deliver on the job training to new staff (see paragraph 3.73 for more information on coaches).

2.59 The draft recruitment strategy includes an acknowledgment that to 'optimise the recruitment strategy, it is imperative that the effectiveness is evaluated through agreed [objectives and key results] OKR / [key performance indicators] KPI's' and it proposes potential key performance metrics. These were not established as a part of the draft strategy.

## Retention

2.60 The 2019 *Independent Review of the Australian Public Service* linked structured support for career development to the retention of staff, especially of specialists. Where there is limited career development this may contribute to a loss of expertise.<sup>49</sup>

2.61 The BOD Workforce Strategy [2024] included six initiatives to deliver on retention: undertaking a wellbeing audit; revising a rewards and recognition framework; a recruitment strategy (see paragraph 2.53); capability framework; workforce supply and demand modelling; and leadership capability uplift. As outlined in Table 2.2, five are in progress or have been delivered, and the wellbeing audit has been paused.

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48 This work is supported by an external provider, DFP Recruitment Services, running selection panels and providing scribing services.

AusTender Contract Notice CN4084121 (DFP Recruitment Services). Contract value: \$1,187,815.20.

49 David Thodey et. al., *Our Public Service Our Future: Independent Review of the Australian Public Service* [Internet], Department of the Prime Minister and Cabinet, Canberra, 2019, p. 193, available from <https://www.pmc.gov.au/sites/default/files/resource/download/independent-review-aps.pdf> [accessed 18 November 2024].



2.62 On 17 October 2024, the department advised the ANAO that the wellbeing audit was paused, as the department's employee assistance program was releasing a wellbeing application. The wellbeing application was released to staff, and on 19 December 2024 the department advised the ANAO that further work on the wellbeing audit remained paused and that the department 'may be required to review this work once [the] TAP [is] completed'.

2.63 Work on a capability framework commenced in 2021 when BOD engaged Potenture<sup>50</sup> to codesign the framework. This framework developed an initial prototype for APS4 Biosecurity Officers and Team Leaders, through a process of discovery and co-design with PEQ staff.

2.64 BOD is building on this work to develop an interactive capability framework (BOD Career Building Blocks) that provides a capability indication for biosecurity officers at the foundational, intermediate, established and expert levels. The proficiency levels are considered in the context of a combination of factors, such as experience, role accountabilities and technical capabilities.

2.65 An intranet site is under development, and when completed, this site is intended to describe various roles in BOD, linked to its duties and responsibilities and role specific skills, knowledge and experience. It also identifies non-role-based functions including workplace coaches (see paragraph 3.73) and 'pathway compliance champions'.

2.66 In 2024, BOD developed Regulatory and Leadership Continuums that map essential and discretionary training for staff as they progress from APS4 to EL2 levels.

2.67 Through the 2024–27 Enterprise Agreement the department committed to convening a working group to develop a mobility program for biosecurity officers within BOD within three months of the commencement of the agreement. The agreed mobility plan was to be designed and in trial for biosecurity officers who wished to participate within 12 months of the commencement of the Enterprise Agreement.<sup>51</sup> The Enterprise Agreement was finalised on 15 March 2024.<sup>52</sup> On 19 December 2024, the department advised the ANAO that the working group had been convened on 3 July 2024 and terms of reference for the working group have been developed and published on the department's intranet. As at December 2024, the design of the mobility program is ongoing.

2.68 When responsibility for PEQ moved out of BOD in September 2022 work on the capability framework specific to the facility was paused (see paragraph 2.63). In November 2024, the PEQ Executive 'agreed in principle' to proceed with a proposal to update and implement the PEQ Competency Framework, with an intent to finalise this work by 30 June 2025.

2.69 The PEQ Strategy and Training Team has developed a spreadsheet that sets out a schedule of the minimum training that should be provided for staff joining PEQ. For some commodities, including avian, plant, biocontainment and enabling services this spreadsheet does not identify specialist commodity training, however, competency requirements at the commodity level are defined in relevant job cards (see paragraph 3.73).

50 AusTender Contact Notice CN3808368 (Potenture [Mint Momentum]). Contract value \$193,756.20.

51 Department of Agriculture, Fisheries, and Forestry, *Enterprise Agreement 2024–27* [Internet], DAFF, Canberra, 2024, clauses 562–565, available from <https://www.agriculture.gov.au/sites/default/files/documents/DAFF-Enterprise-Agreement-2024-2027.pdf> [accessed 29 November 2024].

52 *ibid.*, p. 120.

## First Nations workforce planning

2.70 The *Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy 2020–2024*<sup>53</sup> sets the direction for Australian Government agencies as employers, investing for the future. This includes setting targets for recruitment and retention of Aboriginal and Torres Strait Islander People to increase overall employment numbers at all levels. The current target is to increase First Nations employment in the APS to five per cent by 2030.<sup>54</sup>

2.71 In its Transformation Action Plan, the department committed that its strategic workforce framework would include actions that focus on exceeding the government's commitment to five per cent First Nations representation.<sup>55</sup>

2.72 BOD's Operational Plans include a statement of its commitment to implement initiatives with a focus on recruitment and retention of First Nations employees in key geographical areas, such as for the new Western Sydney Airport, the existing Sydney airport and seaport, and remote inspection ports. There is currently no BOD-specific plan to increase recruitment of First Nations people. Specific actions related to First Nations people, or any other diverse workforce element are not included in the BOD Workforce Strategy [2024].<sup>56</sup>

2.73 The draft BOD Recruitment Strategy includes an intention to increase the First Nations staffing footprint within BOD by 'undertaking work that engages the First Nations communities and encourages employment of First Nations people.' The BOD Recruitment Plan does not include specific tasks related to First Nations recruitment.

## Do the department's workforce strategies and plans support a risk-based response to the delivery of the biosecurity function?

The department has processes in place to consider the workforce impact of changes in risk at the border. These are not consistently applied. BOD has identified the need to formalise surge capacity and capability in executive forums. The division does not currently have a dedicated surge response for deployment during an unexpected biosecurity event. BOD undertook a review of its business continuity plans in 2022 and developed a framework and some plans as a result of the review. The plans are now out of date and have been removed from the department's intranet. A further review and updating project is planned for 2025. PEQ has a business continuity plan that is available on the intranet.

53 Australian Public Service Commission, *Commonwealth Aboriginal and Torres Strait Islander Workforce Strategy 2020-2024* [Internet], APSC, Canberra, 2020, <https://www.apsc.gov.au/working-aps/diversity-and-inclusion/first-nations-employment/commonwealth-aboriginal-and-torres-strait-islander-workforce-strategy-2020-2024-overview> [accessed 21 January 2025].

54 Australian Public Service Commission, *First Nations employment* [Internet], APSC, Canberra, 2024, available from <https://www.apsc.gov.au/working-aps/diversity-and-inclusion/first-nations-employment> [accessed 3 February 2025].

55 Department of Agriculture, Fisheries and Forestry, *Transformation Action Plan*, p. 7.

56 The Indigenous Ranger Biosecurity Program provides surveillance for, and early detection of, biosecurity threats along the northern Australian coastline. It also provides skills, employment and economic opportunities on Country for First Nations people in remote and regional communities. Indigenous Rangers groups are engaged on a fee-for-service arrangement and are managed in the Biosecurity Plant and Science Services Division. They do not form part of the BOD or PEQ workforce.



2.74 The department's goal is to provide 'a risk-based biosecurity system that effectively, efficiently and sustainably protects Australia's health, economic, environmental and national security interests against the threats of today and tomorrow, consistent with our [the department's] Appropriate Level of Protection.'<sup>57</sup> *Biosecurity 2030* [2021] and the *DAFF Biosecurity Roadmap* [2024] state that a 'workforce that has the capacity, skills and flexibility to prepare for and respond to emerging biosecurity risks, challenges and opportunities'<sup>58</sup> is one of the enablers that will allow it to achieve its goals for the biosecurity system.

### Responding to changes in risk at the border

2.75 The process for workforce analysis and communications between risk owners and BOD on development of a new risk (i.e. new type of import), or where there is a significant change to assessment or inspection process, or intervention rate is through the Change Impact Assessment (CIA) process. The impact assessment considers changes impacting people, process, workload, staffing levels, funding and industry. The department's intranet provides guidance that CIAs are required in the following instances:

- legislation, policy and regulation — requiring change to the role, process or decisions of a biosecurity officer;
- biosecurity risk — changes to profiles, rules or new imports requiring increased or decreased interventions;
- digital, tools and technologies — changes to current systems or applications that require changes to or new decision support material and or training;
- new systems or applications;
- process — changes to current processes performed by biosecurity officers that have accompanying decision support material changes and or require training;
- service — a change in the services provided by biosecurity officers; or
- responsibility — requests for biosecurity operations to take on a new function or role.

2.76 As outlined in Table 2.3, during the period 2022<sup>59</sup> to December 2024, of the 139 CIAs developed by the department, the cargo pathway accounted for 90 unique CIAs, the conveyance pathway for 15 unique CIAs and the mail and traveller pathways, eight unique CIAs. All other CIAs impacted more than one pathway.

57 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030* [Internet], DAWE, Canberra, 2021, p. 8, available from <https://www.agriculture.gov.au/sites/default/files/documents/commonwealth-biosecurity-2030.pdf> [accessed 14 November 2024].

58 *ibid.*, p. 8. and Department of Agriculture, Fisheries and Forestry, *DAFF Biosecurity 2030 Roadmap* [internet], DAFF, Canberra, 2024, p. 8 available from <https://www.agriculture.gov.au/sites/default/files/documents/daff-biosecurity-2030-roadmap.pdf> [accessed 29 November 2024].

59 The department started keeping accurate dates for CIAs from 31 March 2022. There were 31 CIAs registered prior to that date.

**Table 2.3: CIA alignment to pathway**

Pathways	Number of CIAs
All pathways	11
Cargo	90
Conveyance	15
Mail	3
Traveller	5
Cargo and conveyance	11
Cargo and traveller	1
Cargo, conveyance and traveller	1
Not assigned to a pathway	2
<b>Total</b>	<b>139</b>

Source: ANAO analysis of departmental documents.

2.77 Twenty-two per cent of CIAs were not required or closed, with the change implemented or withdrawn. Twenty-eight per cent were ‘approved by SES’ or ‘SES not Approved’. The remaining 50 per cent of CIAs were unfinished, with statuses such as ‘registered’ (28 per cent), ‘SME review’ (11 per cent), ‘BOD Change Assessment’ (seven per cent), ‘with requester’ (four per cent) and ‘with SES approver’ (one per cent). One CIA did not have a status.<sup>60</sup>

2.78 Without a well-defined finalisation processes it is unclear if these have been considered by subject matter experts or the divisional executive, or if workforce impacts have been addressed.

2.79 There would be merit in BOD finalising CIAs to ensure that key considerations or potential issues identified by the division are appropriately recorded, and to provide an account of previous deliberations should similar changes be brought forward for consideration in the future.

2.80 To support workforce impact analysis in the CIA, the department developed a spreadsheet-based tool that could be used to estimate staff impact related to change, focussed on the cargo pathway. The tool provided summation of the accumulated workforce impact of changes. The impact on other pathways was not recorded. The tool also recorded the requirement for additional reviews or verifications to assess the impact of many of the changes. This spreadsheet includes data from 2021. It has not been updated for cargo pathway changes since 2023.<sup>61</sup>

2.81 The following examples demonstrate different strategies the department has developed to respond to risks and opportunities presented at the border. One of these, changes to the Compliance-Based Intervention Scheme (CBIS) for prawns (see Case study 1), had workforce impacts considered through a CIA. Changed workforce effort to inspect cherries (see Case study 2) did not.

<sup>60</sup> The CIA that was not allocated a status was excluded from the percentages. Numbers add to more than 100 per cent due to rounding.

<sup>61</sup> On a separate tab of this workbook, there is some workforce impact analysis from 2024 related to a software rollout across the division.

**Case study 1. Inclusion of breaded, battered or crumbed (BBC) prawns in the CBIS 2022**

The CBIS applies a risk-based intervention approach to eligible pathways that demonstrate consistent compliance with Australia's biosecurity import requirements. To qualify for a risk-based intervention under CBIS, importers must initially pass a defined number of consecutive document assessments and inspections. The qualification varies, depending on the compliance of the pathway and the risks associated with each product.

In 2022, the department determined that BBC prawns were deemed to be low risk, and that interventions should be reduced, reflective of this risk. This was based on an assessment that BBC prawn consignments had a very low inspection failure rate. The department anticipated that the 'CBIS will incentivise maintaining good compliance with importers while reducing the operational load of biosecurity prawn inspecting officers'.

The CIA assessed a change to the inspection rate of BBC prawns from 100 per cent 'seals intact'<sup>a</sup> monitoring of the first five consignment lines by two biosecurity officers to a 25 per cent chance of a consignment line being selected for seals intact monitoring by one biosecurity officer. To meet this requirement, importers needed to establish and maintain compliance with biosecurity conditions. Should an importer fail a CBIS inspection, additional monitoring and inspections would be applied.

The CIA estimated that this risk-based intervention should result in a reduction of 1,500 inspection hours annually, leading to an estimated Average Staffing Level<sup>b</sup> saving of 2.2.

Note a: Unopened, with seals intact.

Note b: Average Staffing Level refers to the number of full-time equivalent employees receiving salary or wages (Paid FTE) by the organisation averaged over the financial year. Australian Public Service Commission, *Australian Public Service Common Workforce Metrics*, p. 6.

**Case study 2. Biosecurity risk material detection in cherries from the United States of America**

On 20 June 2024, during routine sampling of fruit, the department found live larvae of spotted wing drosophila (a type of fruit fly) in a consignment of fresh cherries from the United States of America.

The department undertook further examination of the consignment to verify the extent to which the fruit in the consignment was infested. This identified more live larvae and a live pupa in eight out of the ten cartons selected for sampling.

In response to these detections, the department suspended imports of fresh cherries to Australia from the United States of America and undertook an investigation of the supply chain activities of the supplier. The department also removed cherries originating from the United States of America from the CBIS, requiring all consignments to be inspected on arrival followed by mandatory fumigation treatment.

- Consignments of cherries not sourced from the affected supplier were to be inspected using the normal 600-unit inspection method.
- Consignments of cherries sourced from the affected supplier were to be inspected using a higher inspection rate of 920 units.

This change was communicated to staff through changes to Agriculture Import Management System (AIMS) risk profiles.<sup>a</sup>

The department captures time spent on inspection activities and any relevant administrative activities in the AIMS system as these tasks can be cost recovered. The costs related to this risk that were not cost recoverable (such as inspecting the storage for suitability, supervising the wrapping, loading, transportation, unloading and burial of the contaminated goods) were not captured.

The department advised the ANAO on 15 January 2025 that a 'CIA was not practical in the dynamic circumstances of this example'. As a result there was no assessment of the workforce impacts of increased inspection rate prior to the change implementation. BOD did not complete a post detection review of its activities, meaning that evidence of the workforce impact was not collected after the event to inform future decision-making or workforce planning and modelling for future similar situations.

Note a: Agriculture Import Management System (AIMS) is the main import application used by the department. Biosecurity officers assess risks that have been identified in AIMS and assign actions to manage that risk by issuing notices or directions in AIMS to importers and agents. See also Appendix 3.

2.82 On 1 March 2023, the department implemented a change in requirements for cat and dog import permits in response to the increased rabies risk posed by the global commercialisation of the trade in companion animals and identification of associated fraud.<sup>62</sup> This change increased the requirement for quarantine for the import of some cats and dogs, from 10 days to 30 days. The estimated workforce impact identified a need for 30 additional staff.

2.83 PEQ does not have a formalised process for assessing the potential impacts of changes to biosecurity risks and responses on its workforce. Forward workplans are based on analysis of the anticipated volumes of plants and animals expected at PEQ, staff availability and utilisation, and the expected workloads (see paragraph 2.46).

2.84 On 21 November 2024 the department advised the ANAO that it was working to formalise its change impact assessment process at the PEQ with reference to the tools that have been developed and relevant policy, 'including how we might incorporate a formal Change Impact Assessment process.'

#### Opportunity for improvement

2.85 The department could implement stronger arrangements to collect data on, and analyse, the impact of change affecting the biosecurity workforce. This could include increased CIA creation, completion and post implementation reviews across all pathways with insights used to improve workforce modelling and to ensure that workforce efficiencies and staffing realignments due to changes are progressed.

#### *Planning for additional resources*

2.86 BOD does not have formalised arrangements to support coordination of surge support during peak periods. Assistance is generally coordinated 'as required' and not tracked or summarised to enable identification of trends. Within BOD, staff may be shared across locations and pathways based on operational need. This is generally managed through informal

62 Department of Agriculture, Fisheries and Forestry, *Rabies vaccination and tests for cats and dogs coming to Australia* [Internet], DAFF, Canberra, 2025, <https://www.agriculture.gov.au/biosecurity-trade/cats-dogs/rabies-neutralising-antibody> [accessed 21 January 2025].

communications between managers and team leaders with no centralised oversight. The ability to share staff across locations and pathways is dependent on the competencies and training held by different staff (see paragraphs 3.68 to 3.80).

2.87 In February 2024, BODEx discussed the impact of a ‘lack of formality in surge capacity and capability’ with a potential to utilise authorised biosecurity officers from outside the division. Staff from outside the division have previously supported pre- and post-border activities, for example to support risk assessments for military equipment during multinational exercises, and to support responses to post border detection of risk material. At this meeting BODEx and the Compliance and Enforcement division of the department agreed that it would be of benefit to explore formalising surge capacity for both core business and for responses in the context of investigations. As at December 2024, no actions to formalise surge capacity arrangements have been undertaken.

## Business continuity planning

2.88 Business continuity management is a type of risk management designed to address the threat of disruptions to entity operations and support the prompt response to and recovery from these events. It is a requirement of the Australian Government Protective Security Framework that entities develop, implement and maintain a Business Continuity Plan (BCP) to respond effectively and minimise the impacts of significant business disruptions to the entity’s critical services and assets, and other services and assets when warranted by a threat and security risk assessment.<sup>63</sup>

2.89 The department has a Business Continuity Policy and Plan, which set out its approach to managing disruptions to its operations. It also has enterprise planning at the location level and plans to respond to cyclones.<sup>64</sup>

### *Business continuity planning for Biosecurity Operations Division*

2.90 Between April and August 2022 PricewaterhouseCoopers (PwC) conducted a review and maturity assessment of BOD’s business continuity planning.<sup>65</sup> The report provided an overall assessment that business continuity within BOD was in the initial stages of development. The assessment identified opportunities to strengthen BOD’s BCPs, including their:

- availability, coverage and completeness;
- clarity in terms of roles and responsibilities and processes for the activation, escalation, recovery and deactivation;
- cross referencing to other departmental BCPs and Business Impact Assessments; and
- detail on dependent Information and Communications Technology (ICT) systems and associated technology.

63 Department of Home Affairs, *Australian Government Protective Security Policy Framework Release 2024* [Internet], Home Affairs, Canberra , 2024, available from <https://www.protectivesecurity.gov.au/system/files/2025-01/pspf-release-2024.pdf> [accessed 24 February 2025].

64 In addition to this internal framework, the Australian Government Biosecurity and Agricultural Response Plan (AUSBIOAGPLAN) provides a mechanism for Australian Government coordination in response to plant and animal biosecurity and agricultural incidents. The department manages the development and maintenance of the Aquatic Veterinary Emergency Plan (AQUAVETPLAN) and Emergency Marine Pest Plan (EMPlan) manuals. Other sector specific plans are developed and managed by Animal Health Australia (AUSVETPLAN) and Plant Health Australia (PLANTPLAN). The ANAO did not consider these plans.

65 AusTender Contract Notice CN3862083 (PricewaterhouseCoopers). Contract value of \$355,357.55.

2.91 A BOD Business Continuity Framework was developed and endorsed by BODEx at the 9 and 10 August 2022 meeting and finalised on 24 August 2022. It is published on the department's intranet.

2.92 The BOD Business Continuity Framework requires the development of an annual program of work aimed at ensuring BOD's business continuity arrangements are fit for purpose, aligned with better practice approaches, and support the resilience of critical functions and the safety of people. This includes providing regular training, testing and awareness raising, and review and revision of documentation including undertaking an annual review of the framework and supporting documentation, pathway operations functional plans, or following an event or interruption, to ensure the arrangements remain up to date and fit for purpose.

2.93 Since that assessment, BOD's BCPs have not been updated by the department. An internal assessment by BOD in July 2024 found that:

- 17 time-critical functions within the division did not have a 2023–24 Business Impact Analysis, Minimum Resource Analysis or a BCP that was previously Assistant Secretary cleared or in draft;
- the list of time-critical functions mapped to BOD looked to be incorrect and required review and approval<sup>66</sup>; and
- no cleared or draft 2023–24 documents were published.

2.94 In September 2024, BOD advised the ANAO that a new team had taken over the work for BCPs from July 2024 and was in the process of conducting a stocktake of the documents and would continue the development of these documents.

2.95 As at 14 January 2025, the department has updated the BOD Business Continuity pages on its intranet, removing plans without clear executive endorsements, out of date plans, and noting an upcoming review of Business Impact Assessments. On 15 January 2025, the department advised the ANAO that BOD BCPs are in the process of being updated, with plans due by May 2025.

#### *Business continuity planning for Post Entry Quarantine*

2.96 A BCP was developed for PEQ in September 2022.

2.97 The PEQ BCP is stored on the department's intranet allowing for access by staff when required. It covers key information including: critical incident management; key responsibilities (aligned to roles not individuals); and covers: staff; animal welfare; essential services; data backups; and equipment and supplies in the case of a catastrophic incident. The department is maintaining this document, with updates drafted in 2024 that are still to be finalised and approved.

2.98 PEQ participated in a desktop BCP exercise in 2023 led by the Enterprise Strategy and Governance Division of the department. This identified the need for seven response actions to improve business continuity arrangements. On 17 March 2025, the department advised the ANAO that the associated tasks were completed, with one requiring the publication of revisions to the BCP currently in draft.

2.99 PEQ has also developed a Business Impact Assessment. This document was most recently updated in April 2024. This revision has not been approved.

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<sup>66</sup> A function is considered time critical if its maximum allowed outage is 14 days or less.

### 3. Delivery against workforce plans for the biosecurity workforce

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#### Areas examined

This chapter examines whether the Department of Agriculture, Fisheries and Forestry (the department) has met the requirements of its biosecurity workforce plans.

#### Conclusion

The department has been partly effective in meeting the requirements of its biosecurity workforce plans. The biosecurity workforce is below budgeted levels, driven by understaffing in Biosecurity Operations Division (BOD). The department has established mechanisms to authorise biosecurity officers under the *Biosecurity Act 2015*. The department does not have a policy that clarifies the circumstances for biosecurity officer authorisations, including when authorisation is no longer required. The department supports staff to make decisions regarding biosecurity risk through training and the development of decision support material, and has funded projects to update decision support material. Not all instructional material used by biosecurity officers is held in the instructional material library, and 39 per cent of biosecurity-related material in the library is out of date. Staff competencies are not stored in an appropriate record-keeping system and ongoing verification of staff competencies is not part of a risk-based framework that supports divisional and enterprise learnings and continual improvement. The department does not have assurance that staff are booked to cargo inspections in accordance with their competencies.

#### Areas for improvement

The ANAO made three recommendations aimed at providing staff with up-to-date decision support material, improving oversight of biosecurity officer authorisations and revocations, and ensuring staff performing biosecurity inspections have appropriate competencies.

The ANAO identified three opportunities for improvement in documenting and reviewing overtime requirements, record keeping of staff competencies, and establishing an assurance framework for biosecurity assessments and inspections.

3.1 An effective, risk-based, biosecurity system requires a workforce that has the capacity, skills and flexibility to prepare for and respond to emerging biosecurity risks, challenges and opportunities.<sup>67</sup> In *Commonwealth Biosecurity 2030* [2021], the department committed to investing in ‘a skilled and responsive workforce supported by improved regulatory tools and information’.<sup>68</sup>

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67 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030* [Internet], DAWE, Canberra, 2021, p. 8, available from <https://www.agriculture.gov.au/sites/default/files/documents/commonwealth-biosecurity-2030.pdf> [accessed 14 November 2024].

68 *ibid.*, p. 9.



This includes refreshing regulatory frameworks, policies, practices and training.<sup>69</sup> These priorities were reiterated by the department in the *DAFF Biosecurity 2030 Roadmap* in October 2024.<sup>70</sup>

3.2 An appropriate workforce that is skilled and responsive includes delivering the number of staff planned, and planning for future staff resourcing needs; supporting the workforce to make appropriate regulatory decisions through the provision of decision support material; and providing appropriate authorisation, training and recognition of competencies supported by scheduling that ensures biosecurity risk decisions are made by competent staff.

### Has the department delivered its biosecurity workforce in line with its workforce plans?

At June 2024, BOD was 320.9 full time equivalent staff below budgeted staffing levels. This has resulted in increased wait times for industry. At June 2024, the Post Entry Quarantine Facility (PEQ) staffing was at budgeted levels. Over 2022–23 and 2023–24, BOD and PEQ recruitment process timelines exceeded departmental policy requirements. The department has developed materials to assist staff to make biosecurity related decisions and manage biosecurity risk. Not all materials are centrally located in an approved system, and 39 per cent of biosecurity-related instructional material is out of date, creating a risk that biosecurity risk is not being effectively managed.

3.3 In its 2022–23 Annual Report, the department stated that:

The past 12 months have been challenging for our department from a financial perspective. Over the last few financial years, the cost of delivering our essential services and policy and program responsibilities has exceeded the revenue ... Demand also increased for our biosecurity services due to disease outbreaks and an almost 350 per cent increase in international traveller movements from the previous year.<sup>71</sup>

3.4 The department reported that budget pressures resulted in recruitment restrictions during 2022–23, putting additional pressure on the workforce and impacting the department's ability to meet biosecurity client service standards.<sup>72</sup> The 2023 APSC Capability Review found that some stakeholders were concerned the department's resources were stretched beyond capacity, and beginning to result in critical skills gaps.<sup>73</sup>

3.5 Departmental analysis of labour market data indicates that while there is strong labour market demand there are no shortages for biosecurity officers or regulatory staff. The department's

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69 *ibid.*, p. 21.

70 Department of Agriculture, Fisheries and Forestry, *Biosecurity 2030 Roadmap, protecting Australia's environment, economy and way of life* [Internet], DAFF, Canberra, 2024, p. 11, available from <https://www.agriculture.gov.au/sites/default/files/documents/daff-biosecurity-2030-roadmap.pdf> [accessed 29 November 2024].

71 Department of Agriculture, Fisheries and Forestry, *Annual Report 2022–23* [Internet] DAFF, Canberra, 2023, p. xii, available from <https://www.agriculture.gov.au/sites/default/files/documents/Annual%20Report%202022-23%20final.pdf> [accessed 18 November 2024].

72 *ibid.*, pp. 32–35.

73 Australian Public Service Commission, *Capability Review: Department of Agriculture, Fisheries and Forestry* [Internet], APSC, Canberra, 2023, pp. 19 and 37 available from <https://www.apsc.gov.au/initiatives-and-programs/workforce-information/research-analysis-and-publications/capability-review-program/capability-review-department-agriculture-fisheries-and-forestry> [accessed 2 October 2024].



2023–24 Annual Report attributed a nationally competitive labour market to limiting the ability to attract staff to biosecurity officer roles.<sup>74</sup>

### Size of the biosecurity workforce

3.6 A biosecurity officer is a person authorised under section 545 of the *Biosecurity Act 2015* (the Act). As at 12 December 2024, the department recorded 2,850 authorised biosecurity officers including<sup>75</sup>:

- 1,868 authorised biosecurity officers in BOD including two located at PEQ; and
- 41 authorised biosecurity officers from Biosecurity Plant and Science Services Division located at PEQ.<sup>76</sup>

3.7 Staff in other divisions of the Biosecurity, Operations and Compliance Group (apart from BOD and PEQ) may be authorised as biosecurity officers to undertake functions of a biosecurity officer under the Act (for example, collecting samples of goods under section 125 of the Act for the purpose of assessing the level of biosecurity risk). Some staff in the Biosecurity, Operations and Compliance Group are authorised as biosecurity enforcement officers under section 546 of the Act.<sup>77</sup>

3.8 The department has also authorised staff from other Australian Government agencies such as the Torres Strait Regional Authority and Department of Home Affairs. Paragraphs 3.43 to 3.55 discuss authorisations under the Act.

3.9 In BOD, biosecurity officers interpret and apply the Act. The duties of their roles include but are not limited to: performing inspections on imported goods, ships, aircraft, animals, plants and genetic material; and assessment of documentation to confirm compliance with Australia's biosecurity and export market requirements. Biosecurity officers manage goods that do not comply with import and export requirements, capture information to support decisions and provide timely and accurate advice on biosecurity matters to stakeholders and senior managers, including identifying trends in biosecurity risks and escalating these to assist in targeting intelligence and risk-based activities.

3.10 The majority of the BOD workforce, including staff with the role titles of 'Biosecurity Officer', 'Assessments Officer' and 'Client Contact Officer' are at the APS3 and APS4 levels. In PEQ, APS2 and APS4 staff manage biosecurity risk through animal husbandry and horticultural activities. In both BOD and PEQ team leaders are APS5 staff. APS6 officers are operations managers and responsible

74 Department of Agriculture, Fisheries and Forestry, *Annual Report 2023-24* [Internet], DAFF, Canberra, 2024, p.55, available from <https://www.agriculture.gov.au/sites/default/files/documents/annual-report-2023-24.pdf> [accessed 4 February 2025].

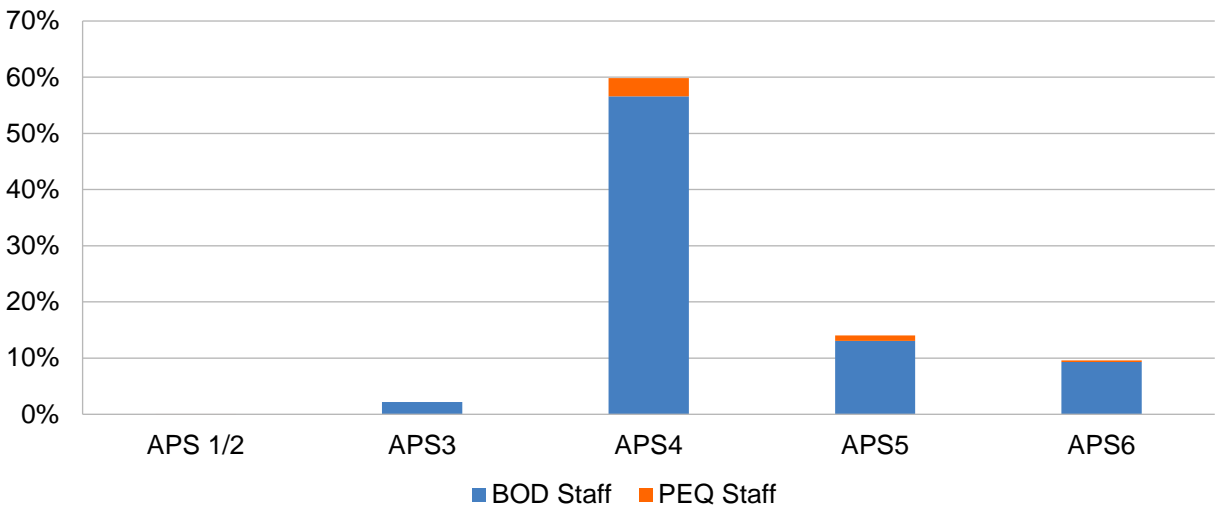
75 This data is held on a spreadsheet external to the department's record-keeping or human resources systems, see paragraph 3.50.

76 A further four authorised biosecurity officers from Exports and Veterinary Services Division and one authorised biosecurity officer from Plant Protection and Environmental Biosecurity Division are located at PEQ.

77 The Director of Biosecurity may authorise a person to be a biosecurity enforcement officer if they are eligible to be a biosecurity officer and have satisfied the training requirements to be a biosecurity enforcement officer.

for several teams in a pathway and location in BOD, or a commodity type in PEQ.<sup>78</sup> The distribution of staff in BOD and PEQ by APS level is illustrated in Figure 3.1.

**Figure 3.1: Distribution of staff by level in BOD and PEQ (June 2024)**

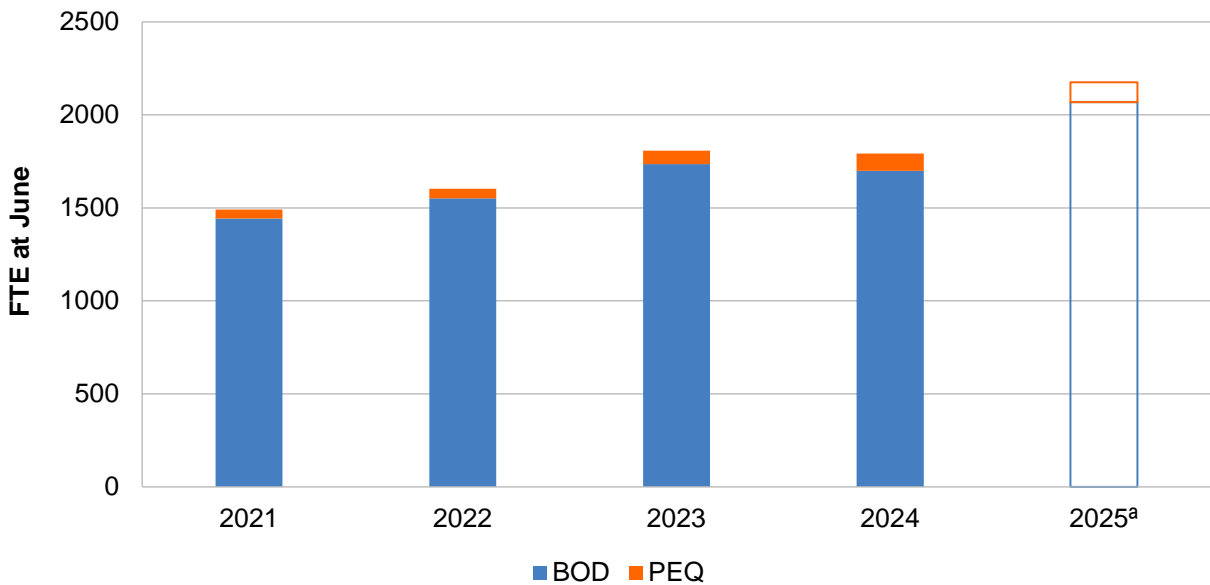


Note: Based on count of actual staff (not full time equivalent (FTE) figures), excluding contracted staff. Proportions do not add to 100 per cent as this chart excludes Executive Level and Senior Executive Service staff.

Source: ANAO analysis of departmental data.

3.11 Figure 3.2 shows BOD and PEQ actual full time equivalent (FTE) staffing numbers from 2021 to 2024 and budgeted staffing for 2025.

**Figure 3.2: BOD and PEQ FTE for June from 2021 until 2024 and budget for 2025**



Note a: 2025 FTE reflects budgeted, rather than actual figures.

Source: ANAO analysis of departmental documentation.

78 Biosecurity operations in Tasmania are delivered by Tasmanian Government staff under a Memorandum of Understanding.

3.12 The department has increased its workforce in BOD and PEQ by 302 FTE since 2021. At 30 June 2024 BOD had 1,699 FTE, which was 320.9 FTE (16 per cent) below budgeted staffing levels, and PEQ was staffed at 93.7 FTE (99 per cent of budgeted staffing level). PEQ's staffing budget for 2024–25 increases to 106.7 FTE. To achieve 2024–25 budgeted staffing (staff for 2025 in Figure 3.2), BOD needs to increase its workforce by 22 per cent (from 1,699 to 2,068.7 FTE), and PEQ by 14 per cent (from 93.7 to 106.7 FTE).

3.13 In its 2023–24 Annual Report, the department reported that 'reduced biosecurity officer numbers' resulted in increased wait times for industry as reported through the service standards.<sup>79</sup>

3.14 As at December 2024, the department had two per cent First Nations representation in the BOD workforce and 1.9 per cent in the PEQ workforce. This is below the Australian Government target of five per cent First Nations employment by 2030, and below departmental targets to exceed five per cent First Nations employment by 2030. On 15 January 2025, the department advised the ANAO that BOD attends career expos and events aimed at First Nations people (and culturally and linguistically diverse employment) to promote diverse career pathways in the department and to provide job seekers with information on recruitment rounds, and that First Nations recruitment specific to Western Sydney Airport (affirmative measures) will commence in March 2025.

### Overtime

3.15 Biosecurity officers perform overtime to fill roster gaps resulting from unplanned leave and industry requests for work out of ordinary working hours, and to perform ongoing functions out of normal working hours.<sup>80</sup> Staff nominate their willingness to work overtime, and overtime is allocated based on industry requests and operational need. Staff are allocated jobs out of normal business hours by their team leader or operational manager.

3.16 Between March 2023 and May 2024, BOD delivered 46,771 hours of overtime, at a cost of \$3.4 million. The cargo pathway accounted for 46 per cent of total overtime in BOD. In the cargo pathway, overtime requested by industry is cost recovered.<sup>81</sup> Traveller Policy and Operations, Human Health and Response Branch accounted for 38 per cent of overtime in BOD, which is generally not cost recoverable.<sup>82</sup>

79 In its 2023–24 Annual Report the department attributed not meeting five of seven biosecurity-related import service standards to 'reduced biosecurity officer numbers'.

Department of Agriculture, Fisheries and Forestry, *2023–24 Annual Report*, pp. 53–54.

80 Ongoing functions that are performed outside of normal working hours through overtime include: watering plants at PEQ on weekends, and mail end point surveys on Sundays. Industry may request inspection, examination, document assessment, analysis, diagnostic activity, clearance of cargo, and treatment outside ordinary hours. This may occur where items are perishable or include live animals. Fees for out of ordinary hours are published on the department's website.

Department of Agriculture, Fisheries and Forestry, *Biosecurity cost recovery arrangement Cost Recovery Implementation Statement: 2024–25*, DAFF, Canberra, 2024, available from

<https://www.agriculture.gov.au/sites/default/files/documents/Biosecurity%20cost%20recovery%20implementation%20statement%202024-25.pdf> [accessed 12 November 2024].

81 Cargo Operations (NSW, Qld, NT and ACT) and Regulatory Assurance Branch performed 14,238 hours of overtime between March 2023 and May 2024. Cargo Operations (Vic, SA, WA and Tas) performed 7,231 hours of overtime in the same period.

At June 2024 35 per cent of biosecurity officers worked in the cargo pathway.

82 Cost recovered services are outlined in Department of Agriculture, Fisheries and Forestry, *Biosecurity cost recovery arrangement, cost recovery implementation statement*, see table 4 for Traveller pathway cost recovered activities.

3.17 Since January 2022, DAFF has performed 11 roster reviews in the traveller pathway; two roster reviews in the mail pathway; and one in the cargo pathway. The ANAO reviewed the modelling to support two traveller roster reviews, one mail roster review, and the roster review in the cargo pathway. The modelling to support the mail roster review included information on overtime and costs for different roster patterns. The modelling for the other reviews did not provide comparison of overtime costs for different roster scenarios.

3.18 One operational area of BOD has documented rules around the allocation of overtime. Staff working in cargo assessments (staff who undertake cargo document assessments for compliance with import permit conditions) are not to be scheduled for more than five hours of continuous overtime. Between March 2023 and May 2024, of the 4,688 instances of overtime by assessments staff, there were 20 instances when staff worked more than five hours overtime in any one day.<sup>83</sup> One APS5 team leader worked 14.5 overtime hours in one day, and an APS4 assessment officer worked 12 hours overtime in one day. The other pathways do not have documented rules or guidelines around the allocation of overtime.

3.19 Without clear guidelines on the use of overtime, it is difficult for the department to have confidence that overtime is being used appropriately and to understand where changes in rostering or additional staffing are cost effective or may relieve overtime pressure on staff.

#### Opportunity for improvement

3.20 The department could develop overtime guidelines and review where overtime is required on a regular basis to determine the most cost-efficient staffing structure to deliver additional hours.

#### *Timeliness of recruitment activities*

3.21 The department's recruitment policy states that the time between the closing date of advertising and delegate approval of the selection committee's report is expected to be no more than 40 calendar days. The Australian Public Service Commission recommends that recruitment activities should be completed as quickly as possible and, where possible, within a target of 28 days from the close of the advertising period to the verbal offer.<sup>84</sup>

3.22 Between 1 July 2022 and 30 June 2024, the department undertook 23 recruitment rounds for APS4 staff in BOD, and two APS4 recruitment rounds in PEQ.<sup>85</sup>

3.23 Over this period, the department received 5,397 applications for BOD positions. From these, 1,051 (19 per cent) applicants were shortlisted, 417 (eight per cent) were offered a role, and 211 (four per cent) were placed in a merit pool. This represents an attrition of 4,346 applications

83 This includes staff from Cargo Assessment Management North and South; and Cargo Operations Assessment North and South.

84 Australian Public Service Commission, *Recruiting Effectively* [Internet], APSC, Canberra, 2024, available from <https://www.apsc.gov.au/working-aps/information-aps-employment/guidance-and-information-recruitment/aps-recruitment-guide/factsheet-planning-recruitment-recruiting-efficiently> [accessed 3 February 2025].

85 This includes biocontainment officers who work to ensure the avian compound is biologically secure. Three of these six PEQ recruitment rounds occurred in 2022 while PEQ was a section within BOD. Since 2022 PEQ also recruited APS2 assistant biosecurity officers and APS3 distribution officers, who are not included in these figures.

(81 per cent) between the application and shortlisting stage. In the two APS4 PEQ recruitment rounds, 96 applications were received, 33 (34 per cent) of applicants were shortlisted and 15 (16 per cent) of applicants received an employment offer. One applicant was placed in the merit pool.

3.24 The average calendar days between advertising close date and first verbal offer in these BOD and PEQ APS4 recruitment processes are presented in Figure 3.3. All recruitment processes adhered to the Australian Public Service Commission's suggested minimum timeframe for advertising of 14 days.<sup>86</sup>

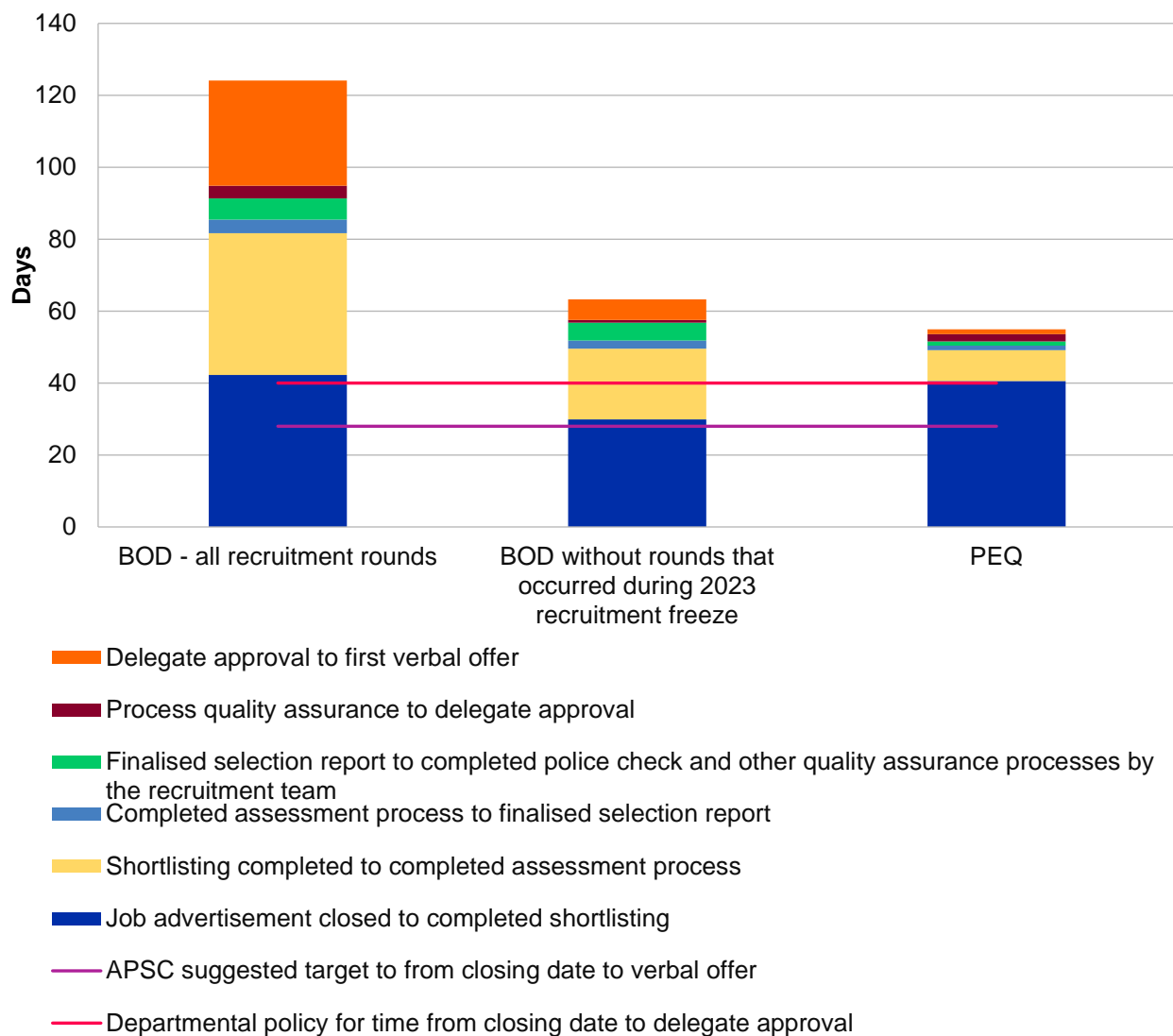
3.25 On 8 March 2023, the department announced a 'temporary pause to recruitment actions' in response to financial pressures (referred to as a recruitment freeze). This freeze remained in place until 31 June 2023, when it was replaced with 'an enhanced approval process to support critical recruitment activity', which considered the backlog of recruitment processes, and requested that recruitment activity be limited to those considered critical by the relevant First Assistant Secretary. Eight of the 25 BOD recruitment exercises between July 2022 and June 2024 were in process during this period.<sup>87</sup>

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86 All vacancies for promotions, ongoing engagements or non-ongoing engagements for an initial period of 12 months must be advertised in the Public Service Gazette. The closing date for applications must be at least seven days from the date the vacancy was advertised, unless there are special circumstances and the Agency Head has approved a shorter period. When considering a shorter period, the obligation to uphold merit continues, which includes that eligible members of the community are given a reasonable opportunity to apply for APS vacancies. However, agencies are encouraged to provide at least 14 days where possible. Australian Public Service Commission, *Recruitment in the Australian Public Service* [Internet], APSC, Canberra, 2024, p. 25, available from <https://www.apsc.gov.au/sites/default/files/2024-10/Recruitment%20in%20the%20APS.docx> [accessed 3 February 2025].

87 No APS4 PEQ recruitment exercises were in process during the recruitment freeze.

**Figure 3.3: Average time taken for recruitment steps, for APS4 recruitment undertaken by BOD and PEQ between 1 July 2022 to 30 June 2024**



Source: ANAO analysis of department documentation.

3.26 On 27 October 2024, the department advised the ANAO that a new recruitment process was being trialled in BOD (see the recruitment strategy in paragraph 2.54). For the one APS4 BOD recruitment round completed between July and October 2024, the time to recruit from the close of the advertisement period to delegate approval was 46 days, with the first verbal offer made that day. There were 651 applications submitted to this recruitment, and 48 job offers made.

3.27 The department has identified that delays in recruitment have resulted in not meeting budgeted staffing levels. This has also impacted on the divisional and departmental budget, where funds were allocated to staffing costs, which were not delivered.

## Materials to support decision-making by biosecurity officers

3.28 The department supports biosecurity officers to make decisions that manage risks through the BICON (Biosecurity Import Conditions)<sup>88</sup> system and decision support material (DSM).

3.29 BICON contains import conditions for more than 20,000 commodities. The department recorded 2,357 changes to BICON during the three years from 1 July 2021 to 30 June 2024. BICON users are made aware of changes in conditions through alerts that are sent to users.

3.30 DSM are 'lawful and reasonable direction[s]' to departmental staff issued under the *Public Service Act 1999*.<sup>89</sup> Staff must comply with DSM pertaining to their roles and duties and departmental executive 'must ensure their staff use and adhere to any relevant DSM.' DSM includes user instructions, references, policies, work instructions, forms, templates, checklists and guidelines. DSM is required to be published in the Instructional Material Library (IML), available from the department's intranet.

3.31 The department has developed instructions to guide the development and amendment of BICON cases and development of DSM. In addition to the department's instructions, BOD published a policy to guide the development of BOD specific DSM in 2024. The department has established mechanisms for feedback on BICON and DSM from staff including: a BICON User Group, which provides a forum to discuss BICON issues; and an opportunity to log issues through the system (for both BICON and the IML), and a BOD specific BICON issues register.

3.32 Departmental policy states that DSM must be reviewed at least every three years. As at August 2024, 372 (39 per cent) of the 951 biosecurity DSM documents on the IML were greater than three years old.

3.33 Job cards (see paragraphs 3.73 to 3.86) include lists of relevant DSM that biosecurity officers should refer to in the discharge of their duties.

- 197 unique DSM documents are listed in BOD job cards. Seventy-one (36 per cent) of these DSM documents are in the IML and 34 of the documents in the IML (48 per cent) are greater than three years old.
- 90 unique DSM documents are listed in PEQ job cards. Seventy-two (80 per cent) are in the IML and 38 per cent of these (27 documents) are greater than three years old.

3.34 Fifty per cent of DSM referred to in job cards are not stored on the IML. On 19 December 2024, the department advised the ANAO that a number of documents referenced in job cards had been updated and renamed, however the new name was not updated in the job cards. The department further advised that instructional material (such as work instructions, guidance material, templates, forms and checklists) that are not on the IML are stored in locations such as SharePoint sites, the department's website or intranet, local drives, or business systems, which are not record-keeping systems under the department's record-keeping policy. Documents

88 BICON is a regulatory tool that has been in place since 2015 to list import conditions to manage biosecurity risk. It is used by biosecurity officers and importers to understand the conditions and requirements that different goods are subject to when entering Australian territory. BICON is not a legal instrument, however information in BICON that replicates a Goods Determination (made under subsection 174(1) of the *Biosecurity Act 2015*) or other legislation, is enforceable. BICON is available at <https://bicon.agriculture.gov.au/> [accessed 1 November 2024].

89 *Public Service Act 1999*, subsection 13(5).



that are not housed in the IML may not be accessible for all officers, and may not be subject to appropriate version control, impacting the ability of staff to follow job cards.

3.35 Since August 2020 the department has entered into five contracts with Noetic Solutions to a total value of \$3,663,670.75 to reform DSM.<sup>90</sup> The department did not prepare a project closure report for one of these engagements and was unable to provide an activity order for another.

3.36 In February 2024, BODEx agreed to update DSM in the cargo pathway. A working group was established and began work in the areas of fresh produce and cut flowers, prawns, and general (vehicles). On 17 March 2025, the department advised the ANAO that prawn (animals) and unaccompanied personal effects (general) decision support material review was still being progressed, and that the horticulture DSM review was approved and published on 3 February 2025.

3.37 PEQ is undertaking two projects to review and update instructional material for other commodities.

- In September 2024 PEQ commenced a project to update work instructions for cats and dogs. A working group has been established to update material in line with the DSM policy developed by BOD.
- The department advised the ANAO on 28 October 2024 that early planning is underway to review and update PEQ plant-related DSM.

### Recommendation no. 3

3.38 The Department of Agriculture, Fisheries and Forestry complete the update of decision support material, to ensure that up-to-date and authorised material is available to guide biosecurity officers in undertaking their roles in accordance with departmental policy, and apply mechanisms to provide assurance the decision support material is used.

**Department of Agriculture, Fisheries and Forestry response: Agreed.**

3.39 *The department will continue to update the relevant decision support material for biosecurity officers within the Biosecurity Operations Division and Post-Entry Quarantine and provide assurance that the decision support material is used.*

## Has the department adopted strategies to monitor its biosecurity workforces' authorisations, training, competencies and scheduling?

The department has established mechanisms to authorise biosecurity officers under the *Biosecurity Act 2015* (the Act). The department would benefit from documentation guiding when authorisation is appropriate, when it should be maintained, and when it should be

90 Austender Contract Notice CN3719023-A1 (Noetic Solutions) from August to November 2020 for \$84,134.00; Austender Contract Notice CN3733420 (Noetic Solutions) from November 2020 to August 2021 for \$130,000.00; Austender Contract Notice CN3736414 (Noetic Solutions) from December 2020 to April 2021 for \$343,818.75; Austender Contract Notice CN3798408 (Noetic Solutions) from June 2021 to August 2021 for \$500,984.00 (This contract included scoping the concept of a training academy (see paragraph 3.60)); and Austender Contract Notice CN3815145 (Noetic Solutions) from September 2021 to June 2023 for \$2,604,734.00.



revoked. The department has identified necessary staff competencies and has developed training and competency assessment processes. Records of competency assessment are not stored in an appropriate record-keeping system and the department does not have assurance the cargo and maritime inspections scheduling system schedules inspectors according to their competencies. The process of verifying staff competencies does not ensure a risk-based approach to coverage, allow for continual improvement of processes, or provide executive oversight.

3.40 Regulatory agencies should ‘actively build staff capability, including ensuring staff have relevant knowledge of the regulatory craft and the industry they regulate’.<sup>91</sup> The department has undertaken to invest in, and support its regulatory workforce to ensure it is professional and capable<sup>92</sup>, including growing the capacity and skills of biosecurity staff.<sup>93</sup>

3.41 The department established the pathway delivery model to equip and support biosecurity officers to make appropriate regulatory decisions ‘supported by training and assessment against core competencies’.

3.42 In administering the Act, the Secretary of the department is responsible for ensuring the biosecurity officers are appropriately authorised.<sup>94</sup>

## Authorisations

3.43 Section 545 of the Act outlines the requirements for the authorisation of biosecurity officers:

- (1) The Director of Biosecurity may, in writing, authorise a person to be a biosecurity officer under this Act if:
  - (a) The person is:
    - An officer or employee of a Commonwealth body; or
    - An officer or employee of a State or Territory body; or
    - A member of the Australian Defence Force; or
    - Another person who the Director of Biosecurity considers it necessary to authorise to be a biosecurity officer under this Act; and
  - (b) The person satisfies the training and qualification requirements for biosecurity officers determined under subsection (5).<sup>95</sup>

91 Department of Finance, *Regulator Performance (Resource Management Guide 128)* [Internet], DOF, Canberra, 2023, Principle 1: Continuous improvement and building trust, available from <https://www.finance.gov.au/government/managing-commonwealth-resources/regulator-performance-rmg-128/principle-1-continuous-improvement-and-building-trust> [accessed 29 November 2024].

92 Department of Agriculture, Fisheries and Forestry, *Regulatory Practice Statement* [Internet], DAFF, Canberra, 2023, p. 6, available from <https://www.agriculture.gov.au/sites/default/files/documents/regulatory-practice-statement.pdf> [accessed 29 November 2024].

93 Department of Agriculture, Water and the Environment, *Commonwealth Biosecurity 2030*, p. 9.

94 Section 540 and subsection 541(1) of the *Biosecurity Act 2015*. Section 540 states that the Director of Biosecurity is the Agriculture Secretary.

95 Subsection 545(1) of the *Biosecurity Act 2015*.

3.44 Section 569 of the Act requires the Director of Biosecurity to issue an identity card to each biosecurity officer. The officer must carry their identity card at all times when performing functions or duties or exercising powers as an officer. The identity card issued must:

- be in the form approved by the Director of Biosecurity for that kind of officer; and
- contain a photograph that is no more than five years old of the officer.<sup>96</sup>

3.45 Biosecurity officers have a range of powers under the Act including: inspecting goods or premises, taking samples of the goods or premises<sup>97</sup>; requiring personal and commercial goods to be treated, exported or destroyed<sup>98</sup>; and directing an aircraft or ship to land or be moored in a certain place.<sup>99</sup> Staff exercising these legislative powers must be appropriately authorised to do so under the Act.

3.46 There are a range of roles that exist outside of BOD and PEQ that require biosecurity officer authorisation (see paragraph 3.7). There is no guidance outside of the Act to assist staff and managers determine which staff require authorisation as a biosecurity officer in order to perform their duties.

3.47 The Biosecurity (Training and Qualification Requirements for Biosecurity Officers and Biosecurity Enforcement Officers) Determination 2016 (the determination) outlines the training and qualification requirements of a biosecurity officer in accordance with paragraph 535(1)(b) of the Act. To be a biosecurity officer, the determination requires a person to first complete the following training:

- an introduction to the *Biosecurity Act 2015*; and
- an introduction to administrative decision-making.

3.48 Both these training courses are provided as e-learning through Learnhub, the department's learning system.

3.49 The department has developed a guide to processing biosecurity officer delegations and revocations. This guide requires the instruments of authorisation, including record of completion of required training, to be saved on the department's record-keeping system.<sup>100</sup> The ANAO randomly selected 157 authorisations to test whether records showed the biosecurity officers had completed the required training.<sup>101</sup> Completed course certifications for both courses were included with the instruments of authorisations for 89 per cent of those biosecurity officers. Of the 11 per cent of authorisations without records of course completion, 10 per cent had completed both courses as required (17 officers), and one officer had not completed the required training courses.<sup>102</sup>

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96 Section 569 of the *Biosecurity Act 2015*.

97 Section 318 of the *Biosecurity Act 2015*. This section of the Act notes that premises include conveyances.

98 Sections 133–136 and 208–210 of the *Biosecurity Act 2015*.

99 Sections 240 and 248 of the *Biosecurity Act 2015*.

100 Content Manager is the department's primary approved record-keeping system.

101 Authorisations were selected from the spreadsheet described in paragraph 3.50.

This sample size was determined based on a confidence level of 95 per cent and a confidence interval of five per cent. The sample excluded officers who were authorised on the 15 September 2017 as 1,140 officers were authorised on that day to bring their authorisation under the [then] recently enacted Biosecurity Act 2015. Officers authorised after 1 August 2024 were also excluded as the ANAO received the Instruments of Authorisation on 1 August 2024.

102 The ANAO was unable to determine whether one biosecurity officer had completed both required courses.

3.50 The department maintains a record of all authorised officers in an authorisation spreadsheet, which identifies the date of authorisation by the delegate, the unique identity card number, and date of card expiry. The authorisation spreadsheet is not held in an authorised record-keeping system.

3.51 The ANAO further tested the random sample of 157 authorisations (see paragraph 3.50) to determine if records of authorised officers are accurately maintained.<sup>103</sup> The department has maintained 97 per cent of records appropriately. The authorisation spreadsheet accurately recorded the appointment date and ID card number 87 per cent of the time. The ANAO was unable to determine the accuracy of the appointment date and ID card number for five per cent of the records, and eight per cent of the records were inaccurate.<sup>104</sup>

3.52 The department advised the ANAO on 28 August 2024 that there is 'continual validation' of the authorisation records, with weekly reviews of the expiry date of identification cards and the filing of training records, and monthly reviews of any changes to biosecurity officer organisational (division) location.

3.53 Authorisation remains in place until revoked through an Instrument of Revocation. The department is informed a biosecurity officer authorisation is no longer required: as the authorisation card is due for renewal; through an exit notification from Aurion; or through review of the spreadsheet entries against staff division and location details. The department has not established processes to identify when an authorisation should be revoked where a staff member no longer requires authorisation under the Act due to a move to a different area of the department, or whether to maintain the authorisation, for example, to allow the authorised officer to contribute to surge capacity during a biosecurity outbreak.

#### Recommendation no. 4

3.54 The Department of Agriculture, Fisheries and Forestry improve its oversight of biosecurity officer authorisations, including by:

- (a) developing a clear policy statement regarding under which circumstances staff should be authorised as a biosecurity officer;
- (b) maintaining records that provide confidence that all biosecurity officers have completed mandatory training; and
- (c) implementing processes to identify where authorisations are no longer required and provide assurance that biosecurity officer authorisation is revoked when it is no longer required.

**Department of Agriculture, Fisheries and Forestry response: Agreed.**

3.55 *The department notes the importance of developing a clear policy statement and this will support initial requests and the review process for biosecurity officer authorisations. Throughout*

<sup>103</sup> The sample for this testing was selected consistent with the parameters described in footnote 101.

<sup>104</sup> Inaccuracies were recorded when the ID card number in the spreadsheet differed from the ID card number recorded by the security pass office when the card was printed, and when the appointment date in the spreadsheet differed from the date of the Instrument of Authorisation.

*2024, BOD has been progressively enhancing the authorisation process, including a stocktake of authorisations, improved record-keeping, and the introduction of a regular assurance review.*

## Training

### *Biosecurity Foundation Program*

3.56 All new APS4 biosecurity officers are required to complete the Biosecurity Foundation Program (BFP). This training is optional but recommended for new operational staff commencing at other APS levels. The BFP runs for six months and seeks to 'provide employees with the fundamental knowledge and skills required to undertake their role' both as APS employees and biosecurity officers. BFP training includes:

- departmental mandatory training;
- biosecurity officer authorisation training (see paragraph 3.47);
- Biosecurity Training Centre regulatory officer training;
- biosecurity core elements training (including training on pests and diseases, corporate matters, and working as a regulator); and
- training about each biosecurity pathway.

3.57 Trainees are required to track their acquired skills and knowledge during the coaching and work placement component of the BFP in a trainee handbook. The handbook is to be signed off by their supervisor and saved in Learnhub (see from paragraph 3.81 to 3.85 for a discussion on Learnhub as a record-keeping system).

3.58 Completion of the BFP is considered in the trainee's probation report. The department advised the ANAO on 29 August 2024 that there are no records of any officer failing to complete the BFP (apart from officers who left the department or BOD). From November 2021 until May 2024 (30 months), 359 staff have completed the BFP, 109 staff had resigned, and six moved from BOD to another division before completing the BFP. As at May 2024, 193 staff were enrolled in the BFP.

3.59 New PEQ staff undertake the PEQ BFP and on-the-job training. The PEQ BFP is a modified version of the BFP delivered in BOD. It is designed to be delivered over the six-month probation period for new staff members and includes self-paced online learning, classroom learning, and on-the-job coaching. The PEQ BFP manager must validate completion of the BFP in Learnhub to provide assurance that all aspects of the BFP have been met.

3.60 New PEQ biosecurity staff are assigned a team of experienced staff to coach them. New staff are also provided with a technical training checklist to track progress in preparation for job card assessment (see paragraphs 3.69 to 3.93 for information on job cards and verification of training).

### *Biosecurity Training Centre*

3.61 As part of its work on decision support material (see paragraph 3.35), Noetic Solutions completed a scoping study for the establishment of the Biosecurity Training Centre (BTC) in July 2021.<sup>105</sup> Noetic Solutions was subsequently engaged from November 2021 until December 2022 to

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105 Austender Contract Notice CN3798408 (Noetic Solutions). Contract value of \$500,984.00.

assist with the establishment of the BTC, a priority action identified in the *Commonwealth Biosecurity 2030 Action Plan 2022*.<sup>106</sup>

3.62 The initial BTC contract statement of work required the establishment and operation of a BTC that would:

- (a) strengthen the professionalism of Australia's frontline biosecurity protection capability;
- (b) respond to current and emerging biosecurity threats as envisaged in *Biosecurity 2030* [2021] and consistent with the likely directions of the National Biosecurity Strategy<sup>107</sup> which was in development at that time;
- (c) provide specialised pathway and general training;
- (d) provide professional education services to allow for vocational courses and, in the future, Australian Skills Quality Authority (ASQA) accredited courses; and
- (e) evolve from an initial focus on foundation training for biosecurity officers to a 'Biosecurity Centre of Excellence' for the Asia Pacific offering a diverse range of contemporary training and awareness programs focusing on the needs of staff, industry stakeholders, and international partners.

3.63 On 29 March 2022 the department contracted Charles Sturt University (CSU) to deliver the BTC over the period 2022–25.<sup>108</sup> Initially the BTC offered eight courses, collectively referred to as biosecurity core training. Core training is now a component of the BFP (see paragraph 3.56).

3.64 In its 2023–24 handbook, the BTC reported that 'in a little over 12 months of operation, the BTC ... delivered over 3,200 staff training days'. The majority of these were to departmental officers, particularly new starters. Specialised courses for more experienced biosecurity officers and staff from Timor-Leste and Indonesia's biosecurity agencies were also delivered.<sup>109</sup> In July 2023, the department reported that 'in its first year of operation, the BTC exceeded the target number of biosecurity officers to receive training' and those officers had improved in their business and ethical knowledge.

3.65 The BTC co-designs a yearly course delivery program and schedule with the department (approved by the Biosecurity, Operational and Compliance Group's Strategic Executive Forum).<sup>110</sup>

3.66 When endorsing the 2024–25 yearly course delivery program, the Biosecurity, Operational and Compliance Group's Strategic Executive Forum was informed that the base cost for the yearly training calendar during 2024–25 was \$3.37 million. Allocated training places in 2024–25 were set at 1,900, at an average cost of approximately \$1,800 per participant.

106 Department of Agriculture, Water and Environment, *Commonwealth Biosecurity 2030: Action Plan 2022*, DAWE, Canberra, p. 16, available at <https://www.agriculture.gov.au/sites/default/files/documents/commonwealth-biosecurity-2030-action-plan2022.pdf> [accessed 13 November 2024].

AusTender Contract Notice 3829813 (Noetic Solutions). Contract value of \$2,088,100.00.

107 Department of Agriculture, Fisheries and, *National Biosecurity Strategy 2022–32* [Internet], DAFF, Canberra, 2022, available from <https://www.agriculture.gov.au/sites/default/files/documents/national-biosecurity-strategy.pdf> [accessed 27 January 2025].

108 AusTender Contract Notice CN3868767-A1 (Charles Sturt University). Contract value \$11,653,081.90.

109 The training program offered to Timor-Leste and Indonesian government officials was to support foot-and-mouth disease and lumpy skin disease preparedness.

110 Previously the Biosecurity and Compliance Board.

3.67 In May 2023, the BTC reviewed its delivery of the BFP. In July 2023, the Assistant Secretary with responsibility for the BTC accepted the review's recommendations.<sup>111</sup> In June 2024 the Biosecurity, Operations and Compliance Group Board was informed that the BTC had implemented the review's recommendations, including 'extending the program across the Biosecurity and Compliance Group workforce; broadening the program focus on regulatory capability and personal and expanding the reach of BTC programs across APS ... and EL levels'.

## Competencies

3.68 The department has developed job cards as 'an assessment tool ... for: workplace-based capability development (and) assessment of competence'. Job cards are the primary tool for competency recognition in cargo inspections, mail, conveyances and traveller pathways and PEQ. Cargo assessment staff use a different framework of competency recognition based on the complexity of different commodities (see paragraph 3.96).<sup>112</sup>

### *Job cards*

#### Job card creation and maintenance

3.69 Job cards identify activities in which the officer needs to be competent; how competency can be demonstrated and assessed; and certification when each competency is achieved. As at December 2024 there were 61 import related job cards for biosecurity officers across all pathways, including PEQ. All are housed in Learnhub. Maintenance and implementation of job cards enables the department to roster according to competencies.

3.70 The department has not developed documentation describing when it is appropriate to create a new job card; what a job card should be created for; or how often job cards should be reviewed. There is no guidance available regarding when a change in work practices (such as an update in work instructions within DSM) may require an update to a job card. There is no framework to guide the conversation between job card owners (generally policy areas), the training team in BOD and PEQ responsible for the competency and training framework, and operational areas using the job cards. Without this guidance there is a risk job cards are not providing the most appropriate direction to staff.

3.71 Of the 61 import related job cards, five state they should be reviewed within two years. Three of those five job cards were published in 2018 and one was published in 2021. One of the five job cards to be reviewed every two years is less than two years old. The remaining 56 job cards do not state a review timeframe and 38 job cards (62 per cent) are more than two years old. The oldest job card was published in 2013.

3.72 The PEQ Facility includes compounds for bees and ruminants<sup>113</sup> however, job cards for these commodities have not been developed. On 7 November 2024 the department advised the ANAO this was because bee and ruminant consignments are rare.<sup>114</sup> The department also advised that

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111 The department did not complete a contemporaneous written record of agreement or discussion on the report. A subsequent email recorded agreement of the concepts of the report and acceptance of the report, noting the need for further discussion.

112 Natural pathways are not included here and are not within the audit scope.

113 Ruminants are hoofed mammals, including cattle, sheep, and goats, with multi-chambered stomachs.

114 Three consignments since 2017: one alpaca consignment in 2018; one llama consignment in 2024; and one bee consignment in 2021.

DSM available in the IML 'detail all pre and post arrival activities for both the ruminants and bee commodities' and that the department works with industry to prepare for and manage these consignments.

#### Job card completion and assessment

3.73 The process for obtaining a job card is documented in the 'Completing a national job card' work instruction. In summary, it requires a biosecurity officer who has the job card (a coach) to provide the trainee officer with instruction, demonstration, and opportunity to practice elements of the competency. The coach documents on the job card when each element of the competency has been learnt. Once the trainee is considered ready, an independent assessor (see paragraphs 3.75 to 3.77) will conduct an assessment. If the assessor has found the trainee competent across all elements of the job card, the trainee uploads the completed job card to Learnhub and the assessor marks the job card as complete in Learnhub. The trainee is also responsible for 'recording the competency outcome in the department's ... content management system'.<sup>115</sup>

3.74 The time expected for staff to complete job cards varies from two weeks to two years.<sup>116</sup> Twenty four of the 61 job cards are expected to take 12 weeks to complete.

3.75 The technical training team in BOD perform independent job card competency assessments. The assessment of competency by independent assessors reduces the chance of operational pressures and personal relationships influencing assessment decisions, however, the assessment provided by these officers is not reviewed to ensure consistency.

3.76 Where the technical training team is unable to provide an assessor for a job card assessment within a certain timeframe (the standard timeframe is three weeks), an operational assessor is able to perform the assessment. Operational assessors are APS5 staff within the operational area who have been approved to provide operational assessments by the technical training team, and have completed an adult education qualification that includes assessor skillset, have completed 'assessing competency' training, and have the relevant, recent job card and operational experience.<sup>117</sup> To maintain the impartiality of the job card assessment process, operational assessors cannot assess an officer if they have been involved in that officer's training.

3.77 Availability of assessors to evaluate competencies has caused delays in job card sign off and impacted the ability of staff to perform inspections independently. In May 2024, there were 66 staff awaiting job card assessment. The department has noted that this pressure will increase with the significant increase in biosecurity officer recruitment currently planned, see paragraph 2.58.

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115 On 11 September 2024, the department advised the ANAO that this refers to officer's own Content Manager container, for their own records and that 'Learnhub ... becomes the record of competency'.

116 Mail endpoint survey, PEQ of plants at the Mickleham PEQ facility, and Releasing plants from PEQ are each expected to take two weeks to complete.

The avian job card requires the officer to demonstrate competencies over three consignments. Including hatching and raising fowl, each consignment takes approximately three months. During the oversight of each consignment, and for a period in between, staff are restricted from contact with other consignments to prevent cross contamination.

117 As of August 2023, five staff were approved as operational assessors for cargo job cards, and nine staff approved as operational assessors for conveyance (maritime) job cards.

3.78 On 28 January 2025 the department advised the ANAO that, to assess a job card in PEQ, the allocated competency assessor 'must have completed the job card they are going to assess and are considered a subject matter expert (SME) in the commodity'.

3.79 The department advised the ANAO on 17 October 2024 that staff regularly work independently prior to formal sign-off of the relevant job card, due in part to a large turn-over of staff recently, and in part due to the limited number of assessors able to sign-off the job cards.

3.80 In 2021 PEQ developed a Competency Framework that included competencies and training required for each commodity to provide 'a clearly defined learning and development pathway for staff at PEQ'. The framework was 'not fully implemented at the time due to structural changes'.

#### Job card record keeping

3.81 BOD uses Learnhub to store records of staff completion of job cards. The department advised the ANAO on 6 November 2024 that records of staff completion of PEQ job cards are held in both Learnhub and Content Manager. Records between these two systems are not consistent. For example, Learnhub records 15 staff as holding Biosecurity officer (Emergencies) Horse Compound job cards. Seven of those job cards are saved in Content Manager.

3.82 The department advised the ANAO on 14 August 2024 that all job cards hosted on the previous system (Janison) were transitioned to Learnhub in 2016 after Learnhub went live. Some records of job card completion were recorded in Aurion, and 'were transitioned to Learnhub by 2020'.

3.83 The ANAO selected a random sample of 134 Learnhub records that showed 'complete' for any of the job cards, where a staff member was in an operational branch within the Biosecurity, Operations and Compliance Group.<sup>118</sup> The ANAO tested whether the job cards had been uploaded to Learnhub as required by the Completing a National Job Card work instruction (paragraph 3.73). Completed job cards were not uploaded in 21 per cent of the records (28 records).

3.84 On 10 October 2024 the department advised the ANAO that job cards may not be available on Learnhub 'due to LMS [Learning Management System] transition in May 2020 that removed previous submission documents', and that 'staff were advised ... prior to May 2020 and were told to retain documents in appropriate record keeping systems'. Neither Janison, the previous system, nor Learnhub are deemed by the department to be a record-keeping system. Twenty five of the 28 records not uploaded to Learnhub completed job cards prior to May 2020.<sup>119</sup>

3.85 As at 12 December 2024, there were 39 Tasmanian Government staff authorised as biosecurity officers.<sup>120</sup> The department advised on 28 October 2024 that no Tasmanian Government

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118 Operational branches were: Maritime Operations and Regulatory Capability; Traveller Policy and Operations, Human Health and Response; Cargo Operations (NSW, Qld, NT, ACT) and Regulatory Assurance; Cargo Operations (Vic, SA, WA, Tas); Mail Policy and Operations and Finance; and Post Entry Quarantine. The sample size was determined based on a confidence level of 90 per cent, and a confidence interval of five per cent.

119 The remaining three records without a job card attached showed completion in July 2022, September 2022 and August 2023.

On 24 March 2025, the department advised the ANAO that records not provided from the sample requested were inaccessible due to being in long term data storage.

120 Staff from the Tasmanian Department of Natural Resources and Environment deliver biosecurity functions on behalf of the Australian Government under a Memorandum of Understanding with the department.



staff undertaking cargo inspections held job cards, however, it was working 'to ensure [Tasmanian Government] personnel hold the correct job card'. Tasmanian Government staff also provide services to the maritime and traveller pathways in Tasmania. Two Tasmanian staff members had maritime job cards, both were assessed in July 2024. The remaining officers that require maritime accreditation had received maritime training plans for commercial vessels and were 'being progressed'. There are four officers with traveller job cards.

### Opportunity for improvement

3.86 There is an opportunity for the department to improve its visibility and oversight of staff competencies by ensuring records are kept in an appropriate record-keeping system in accordance with departmental policy. Records should be accessible to management and available so that competency levels can be assured.

### *Verification of ongoing competency*

3.87 In 2018, under a previous organisational structure (see paragraph 1.10), the department established a process of verifying ongoing competencies for inspections staff. This process was guided by a documented framework which required the results to be reported quarterly to assist in the identification of systemic issues.

3.88 Since December 2021, the department has entered into two contracts with Noetic Solutions to the value of \$4,574,570.40 to develop a verification framework. On 15 January 2025 the department advised the ANAO that the final total expenditure for both contracts was \$3,678,088.77.

- The first contract was to 'pilot a robust Biosecurity Operations Division Verification System'.<sup>121</sup>
- The second contract was to deliver verification framework rollout services so verification would provide 'an important source of feedback in continuing to improve the effectiveness of the biosecurity system'.<sup>122</sup>

3.89 The new verification process was piloted in the maritime pathway before being paused in February 2023 due to 'austerity measures in DAFF' (the department). On 19 December 2024, the department advised the ANAO that an internal team continued to develop modified versions of the BOD verification framework for BODEx consideration. As at January 2024, a transparent, division-wide, verification framework has not been implemented.

3.90 In the absence of a divisional strategy, each operational pathway is responsible for managing their verification. Traveller, cargo and mail pathways continue to use a verification process established in 2018, with quarterly review of staff actions against specific topics or work

121 AusTender Contract Notice CN3835550-A1 (Noetic Solutions). Contract value (including amendment) of \$470,620.00. Following an amendment, the contract ended in April 2022. On 15 January 2025 the department advised the ANAO that the full contract value was not expended.

122 AusTender Contract Notice CN3879970-A1 (Noetic Solutions) Contract value (including amendment) of \$4,103,950.40. This contract was initially until 9 December 2022 and was amended in November 2022 to conclude in June 2023. On 15 January 2025 the department advised the ANAO that due to budget pressures in 2023 the department ended this contract in February 2023 and the total contract cost was \$3,225,981.77.

instructions. The maritime pathway use the verification process established under the piloted verification framework in 2022 (see paragraph 3.89).

3.91 Verifications across all pathways occur against DSM, the use of BICON, and the correct application of fees and charges. The proportion of verifications where re-verification was required due to failures varied across pathways from two per cent (in mail) to 11 per cent (recorded in ‘human health — vessels pathway’).

3.92 Verification outcomes are recorded in excel spreadsheets maintained by pathways and teams. Verifications in the maritime pathway are visualised through Power BI reports. A national report of verification outcomes across cargo inspections, maritime, traveller, and mail, was prepared once, for quarter 1 of 2023, and has not been collated since then.

3.93 The continued application of verification processes across all pathways provides the department with assurance DSM is being appropriately implemented. In the absence of a broader framework information collected on the outcomes of verifications is not used to drive continual improvement, and the department cannot have assurance that verifications are targeted based on risk.

#### Opportunity for improvement

3.94 A risk-based verification process guided by a divisional framework could provide the department with assurance that staff performing biosecurity assessments and inspections are appropriately applying legislative and regulatory frameworks, as outlined in DSM. Learnings from a process that operates under a framework could be used to identify reoccurring or systematic issues, and support continual improvement.

3.95 Verifications for staff in the avian and horse compound are included in the audit process as the facility acts as an Approved Arrangement for these commodities.<sup>123</sup> PEQ has not had a ‘formal verification process’ of other staff competencies since late 2022. Prior to this, PEQ had quarterly verifications for companion animals (cats and dogs) however these ceased when responsibility for PEQ moved to Biosecurity Plant and Science Services Division as part of a restructure (see paragraph 1.10). The department advised the ANAO on 9 October 2024 that PEQ is seeking to re-establish a formal verification process as a part of its competency framework, with an intent to complete this implementation by 24 December 2025.

#### *Competencies outside the job card framework*

3.96 Cargo assessments staff are trained in a series of competencies based on the complexity of the commodity being assessed (see paragraphs 3.110 to 3.112). Cargo assessments’ competencies are recorded in a spreadsheet called ‘National Competency Tracker’. This register records the number of staff who have different levels of competency and assists with workforce planning. In November 2024 the department added to this spreadsheet a record of competencies held prior to 2022 based on 12 different training courses and job cards. This tracker is not held in an authorised record-keeping system.

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123 See footnote 9 for more information on Approved Arrangements.

3.97 The process for verification of cargo assessment competencies is currently guided by a draft work instruction. Verification topics for each month are chosen by the cargo assessments managers, with results of the verifications centrally recorded and reported in a dashboard. On 17 March 2025, the department advised the ANAO that the work instruction covering Cargo Operations import assessments was undergoing final review prior to publication.

## Scheduling

### *Traveller, mail and PEQ*

3.98 The traveller and mail pathways and PEQ operate on fixed rosters. There is sometimes a requirement for shift work to support the import of animals or the arrival of travellers outside normal work hours. In these locations team leaders are required to manage rostering and task allocation. Work is not managed through a centralised scheduling system.

### *Cargo and maritime inspections*

3.99 Cargo and maritime inspection staff are scheduled to perform specific types of inspections in the Scheduling and Workload Management System (SWMS) (see also paragraphs 4.14 to 4.15). This system contains characteristics associated with each inspection staff member (see also paragraph 3.103), intended to align with their assessed competencies. SWMS determines what types of inspections staff members can be scheduled to perform based on each staff members' characteristics in the system, which includes their competencies, and restrictions.<sup>124</sup>

3.100 When an importer or broker books an inspection, the department will determine the SWMS work type appropriate for that inspection. This decision is either made by a staff member or by the resource scheduling optimisation (RSO) tool.

3.101 The RSO tool improves the efficiency of bookings by completing the more straight-forward bookings allowing staff completing manual bookings to focus on more complex bookings. Since January 2023, between 26 per cent and 56 per cent of cargo inspection bookings have been booked using the RSO tool each month. The department has documented a number of limitations to the effectiveness of the RSO tool and has established a working group to consider how the RSO tool may be used more effectively.

3.102 Where bookings are manually allocated, the staff member uses their judgement to determine the appropriate inspection type in SWMS based on the information provided by the industry participant. There are 303 different inspection types in SWMS (including inspections related to the maritime and traveller pathways, but excluding those related to exports).

3.103 When booking an inspection, SWMS will suggest suitable inspectors, based on the records in SWMS of inspectors competencies, restrictions and roster availability. The department has not performed any mapping to link job cards (records of staff competencies, see paragraph 3.73) to the SWMS characteristics assigned to inspectors.

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124 Officer restrictions in SWMS are limitations that can be placed on a resource to prevent them from being booked for certain activities. There are different types of restrictions that can be applied including work type restrictions (for example limiting an officer who has a nut allergy from inspecting nut imports), physical restrictions, location restrictions (including restrictions based on whether the inspection requires an Aviation Security Identification Card or Maritime Security Identification Card); and client restrictions, for example to prevent conflicts of interest.

3.104 The ANAO selected a random sample of 321 biosecurity import-related 'characteristics' assigned to inspectors in SWMS and tested that the completion of the relevant job card was recorded in Learnhub. As the department did not have mapping of job cards to characteristics, the ANAO worked with the department to determine which job cards would be appropriate for each characteristic.

3.105 Of the 321 characteristics: 141 characteristics did not match the relevant job card in Learnhub; 164 had completed the relevant job card in Learnhub; and 15 of the characteristics aligned with previous versions of job cards that had been marked as 'Deactivated' in Learnhub. In one case the relevant job card record in Learnhub was marked as 'Archived'.<sup>125</sup> On 24 March 2025, the department advised that Archived records are created when a person who has previously completed a course re-enrols in that course. Archived records previously did not retain the submission document. On 24 March 2025, the department has advised that recent changes to its Learnhub system now allows these submission documents to be retained with the record.

3.106 The department maintains a register where inspections staff can log issues associated with scheduling of inspections. For the three months from July to September 2024, there were 21 issues raised in the register; eight of those issues related to staff scheduled to inspections without the correct competency (38 per cent of the issues raised).

3.107 The lack of mapping documenting the relationship between job cards (as records of competencies) and characteristics assigned to staff in SWMS has resulted in staff being assigned characteristics that do not match their competencies. The department does not have assurance that staff are performing inspections they have been assessed as competent to undertake.

### Recommendation no. 5

3.108 The Department of Agriculture, Fisheries and Forestry ensure staff scheduled for inspections have the appropriate competencies, and develop processes to provide assurance that staff scheduled in the Scheduling and Workload Management System (SWMS) are scheduled in accordance with their competencies.

**Department of Agriculture, Fisheries and Forestry response:** *Agreed.*

3.109 *The department will establish an assurance process to ensure that staff competencies align with inspection bookings. This will include verifying SWMS data to confirm that only appropriately skilled staff are scheduled for inspections.*

### Cargo assessments

3.110 Cargo importers lodge import documents through the Cargo Online Lodgement System for assessment by the department prior to goods arriving in Australia.<sup>126</sup> Cargo assessments staff access this documentation through the Cargo Workflow Management System (CWMS).

<sup>125</sup> Due to the large error rate, this test cannot be considered a representative sample of the whole population and the sample size was not statistically valid.

<sup>126</sup> Department of Agriculture, Fisheries and Forestry, *Cargo Online Lodgement System (COLS)* [Internet], DAFF, Canberra, 2024, available from <https://www.agriculture.gov.au/biosecurity-trade/import/online-services/cols> [accessed 29 November 2024].

3.111 There are 25 commodities in CWMS. Each commodity aligns with a competency and is assigned a complexity (fundamental, intermediate or complex). CWMS allocates document assessment jobs to staff based on that staff member's competencies in CWMS.

3.112 The ANAO compared the staff who had worked on commodities that included a complex rating in CWMS in June 2024, with staff who had been recorded as being competent in complex commodities in the National Tracker (see paragraph 3.96). All staff who performed document assessments on commodities with complex attributes in June 2024 had been assessed as competent in complex commodity document assessment.<sup>127</sup>

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127 This includes staff who had been assessed as competent since 2022 and staff who had recognised prior learning (see paragraph 3.95).

## 4. Monitoring and reporting of the activities and delivery of the biosecurity workforce

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### Areas examined

This chapter examines whether the Department of Agriculture, Fisheries and Forestry (the department) has established effective arrangements to monitor and report on the activities and delivery of the biosecurity function and its workforce.

### Conclusion

The department's monitoring and reporting of biosecurity activities and workforce is partly effective. The department has systems in place that collect data on the biosecurity workforce and on the activities and delivery of the biosecurity function. Data quality issues relating to establishment and scheduling data limit the department's understanding of its resource allocation. The department is currently progressing an enterprise-level human resources data-linking project, which has the potential to provide insights into its workforce. Until there are links between resource systems and biosecurity outcomes, the department is unable to gain assurance over the effectiveness of its workforce allocations against biosecurity risks. Ongoing deficiencies in the department's record keeping impact its documentation of its business considerations and decisions, and risks the department being unable to demonstrate that staff have the competencies to undertake tasks they are assigned.

### Areas for improvement

The ANAO made two recommendations aimed at reviewing the implementation of the department's record-keeping policy including ensuring that appropriate business records are generated and managed in systems with record-keeping functionality, and generating a framework to report the impact of biosecurity operations against overall system health. The ANAO identified one opportunity for improvement related to the department consolidating its internal report catalogue for improved ease of use.

4.1 Monitoring and reporting are essential for tracking the progress and impacts of workforce planning initiatives. Integrating workforce monitoring and reporting into regular business evaluation and reporting cycles, such as through developing and publishing dashboards or reports, enables entities to show progress against key metrics and targets.<sup>128</sup>

4.2 To determine whether the department uses information to report on the activities of the biosecurity workforce in delivering the biosecurity function, the ANAO considered the systems in place that collect relevant data, the quality of the data within those systems, and whether the department's reporting supports an understanding of the effectiveness of the biosecurity workforces' activities.

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128 Australian Public Service Commission, *Workforce Planning Guide*, APSC, Canberra, 2023, p. 35, available from <https://www.apsc.gov.au/sites/default/files/2023-04/APS%20Centre%20of%20Excellence%20-%20Workforce%20Planning%20Guide%20-%20Accessibility.pdf> [accessed 6 November 2024].

## Does the department have systems in place that collect data on the activities and delivery of its biosecurity workforce?

The department has systems in place that collect data on the activities and delivery of the biosecurity workforce. Biosecurity Operations Division (BOD) has identified deficiencies in its data governance over the collection of information into Aurion and the Scheduling and Workload Management System (SWMS). There are also deficiencies in the department's record keeping, which result in a lack of clarity over decisions taken and assurance over key processes. The inconsistent, incorrect or incomplete collection of information impedes the ability of the department to use data to understand its workforce and activities.

4.3 To manage data as a valuable national asset, the Australian Government expects entities to establish and invest in appropriate mechanisms, infrastructure and practices to support data collection, management, storage, protection and use. Treating data as an asset requires entities to recognise its value and importance to their operations, devote suitable resources to its collection, maintenance and use, and unlock its full potential, including by making data-driven decisions.<sup>129</sup>

4.4 The 2023 APSC Capability Review found that the department does not have a consistent and validated workforce dataset, and stated that workforce data:

combined with the expertise to draw out insights, is critical to an effective workforce strategy and would support [the department] to plan and make informed decisions about attracting, developing and retaining core capabilities. Consolidating and centralising this data to develop a trusted source of truth is a foundational step towards building a culture where workforce decisions are made based on a workforce strategy and associated workforce plan.<sup>130</sup>

4.5 The department recognises the need to extract 'the full value from available data' to 'make better, more informed decisions' and meet the biosecurity challenges of the future.<sup>131</sup>

### *Workforce Planning and Development — Reporting project*

4.6 To implement the commitments outlined in the department's Transformation Action Plan (TAP) (see paragraph 2.5) the department developed priority actions including workforce data and reporting initiatives.

4.7 The Workforce Planning and Development — Reporting project (reporting project) is intended to 'uplift the department's workforce data and analytics capability using modern, integrated, digital solutions that enable timely and accurate workforce insights to drive decision-making, performance and strategic workforce planning.' The reporting project seeks to develop an integrated data model and visualisation products that combine data from different enterprise-level systems. The initial milestone focussed on an Aurion data model with subsequent

129 Data and Digital Government Strategy, *Data and digital foundations*, Australian Government, 2023, available from <https://www.dataanddigital.gov.au/strategy/missions/data-and-digital-foundations> [accessed 19 November 2024].

130 Australian Public Service Commission, *Capability Review: Department of Agriculture, Fisheries and Forestry* [Internet], APSC, Canberra, 2023, p. 18, available from <https://www.apsc.gov.au/sites/default/files/2023-09/DAFF%20-%20Capability%20Review%20Report%202023.pdf> [accessed 2 October 2024].

131 Department of Agriculture, Fisheries and Forestry, *Biosecurity 2030 Roadmap, protecting Australia's environment, economy and way of life* [Internet], DAFF, Canberra, 2024, p. 25, available from <https://www.agriculture.gov.au/sites/default/files/documents/daff-biosecurity-2030-roadmap.pdf> [accessed 29 November 2024].

phases planned to incorporate Learnhub (June 2025)<sup>132</sup>, recruitment, (June 2025), and financial systems data (December 2025 and June 2026)<sup>133</sup>, and to develop an HR data governance framework (June 2026).

4.8 As at December 2024, the department's internal reporting indicated that the first phase of this work has been delivered with the development of an integrated data model based on Aurion data, and the release of enhanced workforce reports. Work is continuing with future phases intended to incorporate additional data expected to be completed by June 2026, with the release of additional workforce planning reports and products, and updates to enterprise planning processes and templates to include workforce planning.

4.9 The inability to link sets of the department's enterprise-level workforce data limits its ability to interrogate that data to inform decision-making. The progression of the reporting project as a part of the Transformation Action Plan, if successful, has the potential to assist workforce data integration.

### **Biosecurity workforce information systems and reports**

4.10 The systems environment that supports the delivery of the biosecurity function is summarised in Appendix 3. This includes enterprise-level corporate information systems such as the human resources information system (Aurion) and financial system (TechnologyOne), as well as systems specific to the biosecurity function. Systems to support biosecurity risk management are owned by the department and by other Australian Government entities.

4.11 The department uses information from the systems described in Appendix 3 to create dashboard reports that provide information on the biosecurity workforce and delivery of the biosecurity function.

#### *Data quality to support analysis*

4.12 The ability to analyse biosecurity and workforce data is fundamental to workforce planning as it allows the organisation to make evidence-based decisions. The department's information management policy acknowledges that 'good data facilitates complex analysis' and aims to make the best use of tools and technologies to support good information and data outcomes.

4.13 The department has identified that it 'does not have a consistent and validated workforce data set'.<sup>134</sup> Incomplete mapping of staff competencies and scheduling as described in paragraph 3.107 reduces the department's confidence that staff undertaking inspections hold the correct competencies for that work. Inaccurate data impacts the ability of the department to draw insights regarding the delivery of the biosecurity function, and the capability, capacity and disposition of the biosecurity workforce.

4.14 Data accuracy in systems with manual data elements rely on staff correctly inputting data. One system used by BOD with manual data entry is the Scheduling and Workload Management

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132 The delivery date of phase 2 (integration of Learnhub data) was initially December 2024. The December 2024 workforce reporting project status report updated the target completion date to 30 June 2025.

133 This included TechnologyOne data in phase four and Employee Census and Lighthouse (the department's financial management compliance system, hosting forms to assist with finance, integrity, security and other corporate functions) in phase five.

134 Australian Public Service Commission, *Capability Review: Department of Agriculture, Fisheries and Forestry* [Internet], APSC, Canberra, 2023, p. 18.



System (SWMS, see paragraphs 3.99 to 3.103), which is dependent on staff recording when jobs have started and ended. The department is monitoring identified data governance and quality issues related to inspection booking times being incorrectly entered.<sup>135</sup> Where jobs are not closed, work effort data is impacted, affecting the reliability of analysis utilising this data. In the case of SWMS, this data is included in seven dashboard reports: five related to inspections bookings<sup>136</sup>; one used to monitor the quality of data being inputted into the system; and one developed to assist identifying commodities for potential inclusion in CBIS (See paragraph 2.81 and Case study 1). The department used data from SWMS to report on service standards in its 2023–24 Annual Report.<sup>137</sup>

4.15 The department advised the ANAO on 9 January 2025 that it has been working to improve understanding of data errors in SWMS and the reasons they occur. It stated that this has involved detailed analysis of the data and:

- prompting local management teams to discuss data errors with the individuals concerned;
- engaging with the Business System Development and Support team<sup>138</sup> within the department regarding the system causes of data errors, and where these cannot be resolved removing them from reporting; and
- further refinements to data reports.

4.16 Position establishment (or position management) data represents how an organisation manages and structures its workforce, including identifying budgeted and unbudgeted positions, and planning, creating and deleting positions within the organisational structure.<sup>139</sup> The APS Workforce Planning Guide states that establishment management can provide information for effective budgeting, recruitment, workforce planning, reporting and career mapping and progression.<sup>140</sup>

4.17 The department uses Aurion as its personnel management system. Maintaining establishment data in Aurion requires manual data inputs and governance, for example in the creation and management of positions. While most organisational structures have valid vacant

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135 As at 1 September 2024, the data quality report stated that SWMS had:

- 15,514 open work orders, the oldest being from 8 March 2021; and
- 33.6 per cent of completed bookings with no work or travel hours recorded against them.

136 Five of these are import related, one is related to exports.

137 Department of Agriculture, Fisheries and Forestry, *Corporate Plan 2023–24* [Internet], DAFF, Canberra, 2023, pp. 37–39, available from <https://www.agriculture.gov.au/sites/default/files/documents/daff-corporate-plan-2023-24.pdf>; performance measure BI-02 Biosecurity service standards are met. The service standard for ‘Goods inspected at an approved premises’ uses SWMS data.

See also Department of Agriculture, Fisheries and Forestry, *Annual Report 2023–24* [Internet], DAFF, Canberra, 2024, p. 56, available from <https://www.agriculture.gov.au/sites/default/files/documents/annual-report-2023-24.pdf>.

The department was one of 10 entities examined in the ANAO’s audit of the Annual Performance Statements of Australian Government entities in 2022–23. The ANAO assessed that the department’s performance measure relating to biosecurity service standards did not sufficiently comply with the PGPA requirements, specifically noting reliability and verifiability issues relating to data and systems.

138 The Business System Development and Support team are responsible for managing departmental systems including SWMS.

139 Australian Public Service Commission, *Workforce Planning Guide*, Appendix 4.

140 *ibid.*, p. 49.

positions, on 25 July 2023, BOD identified 459 positions in Aurion as substantively and actually vacant and requested these be deleted.

4.18 In May 2024, the department drafted instructions to ‘outline the governance and management of Biosecurity Operations Division’s structure and staffing’. The draft instructions are designed to contribute ‘to accurate workforce data by continuously updating positions and organisational units to reflect changes to vacant and filled positions, assisting with recruiting efforts, and enabling effective workforce planning’. As at 19 December 2024 these instructions were not approved.

### *Information management*

4.19 Authentic, complete and reliable information is necessary to make evidence-based decisions, provide sound advice, develop good policy and deliver services and programs effectively.<sup>141</sup>

4.20 During the ANAO’s audit of the department’s 2023–24 annual performance statements the ANAO identified deficiencies in the department’s information management and reporting, including identifying risks related to the completeness, reliability and record keeping of performance information. In response, the department agreed to a recommendation that included reviewing and enforcing its record-keeping policy, and outlining clear roles and responsibilities for staff in relation to compiling and maintaining records, and implementing and reviewing quality assurance processes. In recent audits relating to the effectiveness of the department’s design and early implementation of the National Soil Strategy, and its cultural reform program the ANAO found deficiencies in the department’s record keeping.<sup>142</sup> In response to Auditor-General Report No. 27 2023–24 *Design and Early Implementation of the National Soil Strategy* audit, the department agreed to a recommendation relating to record keeping including that, to reinforce the importance of good record keeping for integrity, transparency and accountability in the management of public resources, the department’s record-keeping systems and practices are made compliant with the official requirements.<sup>143</sup>

4.21 In October 2023, the department published its Information Management Policy. This policy acknowledges that ‘good information management enables the department to meet its business, legislative and accountability requirements.’ Within a more comprehensive list, this document allocates the following responsibilities within the department, to:

- ‘establish an organisational culture that encourages and supports staff to manage and use information assets strategically’ to the Chief Information Governance Officer;

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141 National Archives of Australia, *Building Trust in the Public Record* [Internet], National Archives of Australia, Canberra, updated June 2023, available from <https://www.naa.gov.au/information-management/information-management-policies/building-trust-public-record> [accessed 29 October 2024].

142 Auditor-General Report No.17 2022–23, *Department of Agriculture, Fisheries and Forestry’s cultural reform*, ANAO, Canberra, 2023, Appendix 5, available from <https://www.anao.gov.au/work/performance-audit/department-agriculture-fisheries-and-forestrys-cultural-reform> [accessed 16 April 2025].

Auditor-General Report No.27 2023–24, *Design and Early Implementation of the National Soil Strategy*, ANAO, Canberra, 2024, paragraph 2.22, available from <https://www.anao.gov.au/work/performance-audit/design-and-early-implementation-the-national-soil-strategy> [accessed 24 February 2025].

143 Auditor-General Report No.27 2023–24, *Design and Early Implementation of the National Soil Strategy*, paragraph 2.22.

- ‘champion and actively support and encourage adherence to this policy by promoting a culture of compliant information management within the department and to ensure that systems commissioned and used in their area have capacity to manage information in place ...’ to Senior Executives; and
- ‘create and manage official business information in line with this policy and the information management requirements of their role’ to all staff.

4.22 The Secretary remains ‘ultimately responsible for ensuring there are robust management and security controls in place for the department’s information.’

4.23 This policy identifies Content Manager as the department’s primary record management system. Other endorsed record-keeping systems in the department are TechnologyOne, Aurion, and the Parliamentary Document Management System.<sup>144</sup>

4.24 Throughout this audit the ANAO has identified documents that should provide evidence of key decisions that were not managed appropriately, with decisions or executive endorsements not clearly recorded. The ANAO has also identified where previous work progressed by the department was unable to be located, documents were held in draft for extended periods, and key records were not appropriately migrated or stored in record-keeping systems (see paragraphs 2.28, 2.54, 2.93, 3.35, 3.49, 3.51, 3.81, and 3.96).

4.25 Where records are not generated or managed in record-keeping systems, there are risks that the department is unable to provide evidence of its decision-making processes, of outcomes of procurement activities, and to provide assurance that staff have the appropriate authorisations and competencies to undertake activities they are scheduled to perform, including when decisions are reviewed by external bodies such as the Administrative Appeals Tribunal.<sup>145</sup>

## Recommendation no. 6

4.26 The Department of Agriculture, Fisheries and Forestry review its record-keeping processes with a focus on generating and managing business information and evidence of decision-making in authorised record-keeping systems.

**Department of Agriculture, Fisheries and Forestry response: Agreed.**

*4.27 The department will enhance the maturity of its records management processes in accordance with the department's Information Management Suite of documents issued in October 2023. Business areas will review their business processes and systems to identify opportunities to streamline and integrate information management into daily operations.*

144 For more information on the Parliamentary Document management system, see: Department of Finance, *Parliamentary Document Management System (PDMS)* [Internet], DoF, Canberra, 2021, available from <https://www.finance.gov.au/government/whole-government-information-and-communications-technology-services/parliamentary-document-management-system-pdms> [accessed 1 December 2024].

145 Certain decisions under the Biosecurity Act are reviewable. There is a list of decisions that are reviewable at section 574 of the Act. Decisions can be reviewed internally, where a new decision maker will undertake a review of the decision on its merits and make a new decision affirming the decision, varying the decision or setting aside the decision and substituting a new decision. Decisions can be further reviewed through an application to Administrative Appeals Tribunal (AAT) who will conduct an independent merits review of administrative decisions made under Commonwealth laws.

## Does the department use its reporting to drive data informed decision-making about its biosecurity workforce activities?

The department has created dashboard reports summarising biosecurity activities and the workforce. These are used by staff at all levels and in all pathways. Reports present information on the activities undertaken by the department, and its operating context. Inconsistent data collection and the absence of leakage reporting against all pathways and locations impacts the department's ability to understand and prioritise risks presented by each pathway and to allocate its workforce in response.

4.28 The department has two data teams that create biosecurity operations and workforce reports based in Microsoft Power BI<sup>146</sup> using data from the various information systems.<sup>147</sup> These reports provide insights and activity reporting on each BOD pathway and Post Entry Quarantine Facility (PEQ) in the management of the border. The analytic features of the dashboards such as filtering and 'click through' data provide insights and focus areas, for example highlighting data related to location and historical comparisons.

4.29 Reports developed by the department's data teams are accessed through separate catalogues on the department's intranet or through the Power BI app. Access to — and data presented in — reports is managed based on the user's classification levels and organisational hierarchy, or through person-specific permissions.

4.30 There is no clear documentation provided on the department's intranet as to which data team is responsible for what type of reporting, which would support users' identification of relevant reporting. There is overlap in biosecurity-related reporting as both teams have biosecurity workforce and biosecurity delivery reports in their separate catalogues.

### Opportunity for improvement

4.31 The department could consolidate its report catalogues to facilitate easier report identification and use by staff.

## Workforce reports

4.32 The department has developed three department-wide workforce related reports. Two of these reports cover aspects of the workforce including the location of staff, employment type, job family, diversity, commencements, and scheduled and unscheduled leave. The target audience for

146 Power BI is a collection of software services, apps and connectors that can be used to integrate data from multiple sources to make the data easier to understand, with the intent of providing actionable, visually immersive, interactive insights. Microsoft, *What is Power BI?*, Microsoft, United States, 2024, available from <https://learn.microsoft.com/en-us/power-bi/fundamentals/power-bi-overview> [accessed 4 November 2024].

147 The department creates data models from source information systems for the generation of reports. This involves cleaning, transforming, indexing and integrating the input data to create table-based models with simplified data for the development of analyses and reports. Where potential data issues are identified during this process, these are raised with the business owners to seek clarification and correction within the source system. Curation of data does not include quality control of data within the source data systems. The Enterprise Data Branch (EDB) creates the curated data models and some reports. The BOD Data and Automation (BDA) team uses the EDB data models as 'a single source of truth' to generate their own biosecurity Power BI reports.

these workforce related reports range from APS4 through to EL2. In December 2024 the department finalised an additional 'SES workforce' report, which provides more detailed information, aggregated at a level reflecting the users' level of responsibility.

4.33 The department has also developed 12 BOD-specific workforce reports that use information from scheduling systems to determine the location of the workforce, staff competencies and location to support workforce scheduling, and to analyse the time taken to deliver services.

4.34 The PEQ 'performance placemat' and Power BI reports provide information on current and projected arrivals, linked to staffing requirements. These reports do not directly provide information on workforce, such as numbers of staff with competencies and training pressures. Workforce monitoring is managed in workforce management spreadsheets (see paragraph 2.46).

## Biosecurity reports

4.35 As of 4 October 2024, there were 135 biosecurity-related reports delivered across the two data teams.<sup>148</sup> These reports cover all BOD's pathways; some reports are pathway-specific, others have application across multiple pathways (for example reporting on detections of foot and mouth disease and hitchhiker pests which represent a risk in all pathways).<sup>149</sup>

4.36 The other biosecurity reports included metrics related to import and conveyance volumes and status, including historic assessment, inspection and interception activities.

4.37 As of 14 September 2024, there were 46 biosecurity reports created by the BOD data team.<sup>150</sup> In the period 18 June 2024 to 14 September 2024, all of these reports were used. Each report had an average of 92 unique users, and an average of 153 views. Over this period, the highest viewed report, 'Cargo — workload snapshot', recorded 779 unique users and 1,256 views.

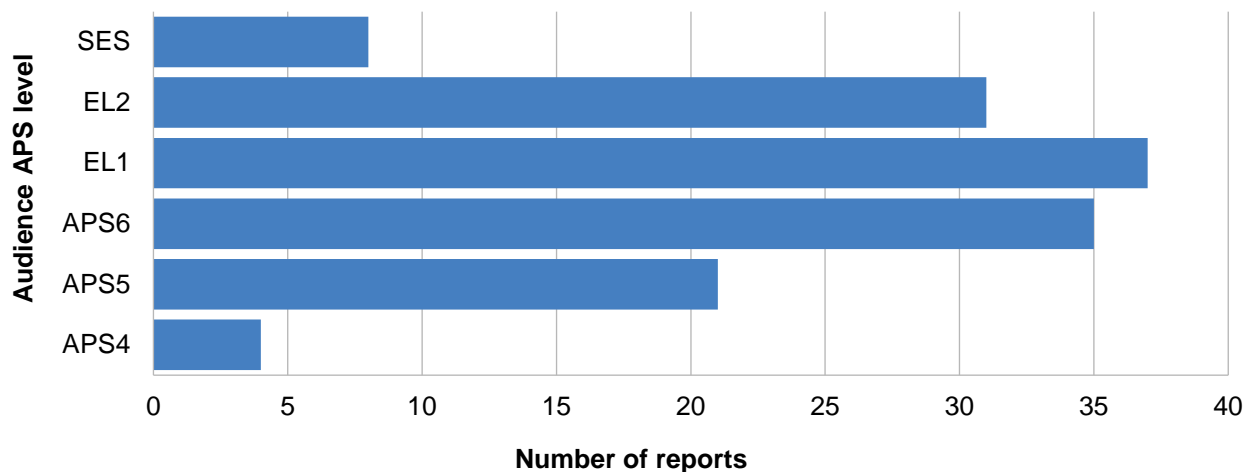
4.38 The reports are designed for target audiences that can include several staff levels. Figure 4.1 shows the breadth in the intended audience for the BOD data team reports (this figure includes reports that were aimed at more than one level).

148 This figure excludes 15 reports created by the BOD data team but not included in the data catalogue because they were Power BI in-built reports, reports that were archived, not published, were only for the data team, developed for a single person, and one report which is restricted to single policy area.

149 Pests that can be carried, or hitchhike, via sea containers, their cargoes and associated packaging.

150 This figure excludes 15 reports, see footnote 148. This data also excludes the 'SAC Air Cargo CCV' report (analysis of the leakage of biosecurity risk material in the low value cargo pathway), which was not included in the original report usage dataset provided to the ANAO. As use data is only available on a rolling 90-day period, the ANAO was unable to incorporate subsequent data provided by the department into its analysis. These reports related to compliance verification activities were viewed an average of 51 times by 17 unique viewers, between 19 September 2024 and 12 December 2024.

**Figure 4.1: APS level audience of BOD data team reports (November 2024)**



Source: ANAO analysis of department documents.

### Reporting on the effectiveness of biosecurity activities

4.39 The 2020 report developed by the department and the Centre of Excellence for Biosecurity Risk Analysis (CEBRA) *Evaluating the health of Australia's biosecurity system* identified attributes of system health to be its effectiveness, efficiency, capacity and capability, robustness and resilience and sustainability.<sup>151</sup> Key evaluation questions identified to assess system health include:

- how effectively do activities to screen entry pathways to detect non-compliance contribute to the direct outcome that the number of priority pests and diseases entering Australia is reduced?
- how effectively do activities to prepare for an incursion or outbreak of pests and diseases contribute to the direct outcome that participants in the biosecurity system are ready to respond to priority pest and disease incursions or outbreaks?
- are the resources invested in the biosecurity system allocated across activities in a manner that maximises the efficiency of the system and delivers the highest return on investment?
- does the system have the appropriate capacity and capability, that is the quantity and quality of financial, physical, human and organisational resources, to meet its objectives?<sup>152</sup>

4.40 That report proposed an evaluation framework that required performance benchmarks stating that:

without clear statements of performance expectations, indicators are limited to information about the results of the system rather than real assessments of its performance — they do not of themselves define whether a system is healthy. An essential step to evaluating system performance is defining what a healthy system looks like. This can involve defining performance benchmarks or targets that are deemed healthy, as well as setting expectations of future

151 Karen Schneider and Edith Arndt et.al., *Evaluating the health of Australia's biosecurity system* [Internet], CEBRA, The University of Melbourne, Melbourne, 2020, p. viii, available from [https://cebra.unimelb.edu.au/\\_data/assets/pdf\\_file/0011/3423278/Endorsed-CEBRA-170714-Final-Report-June2020.pdf](https://cebra.unimelb.edu.au/_data/assets/pdf_file/0011/3423278/Endorsed-CEBRA-170714-Final-Report-June2020.pdf) [accessed 7 November 2024].

152 *ibid.*

performance. These targets and benchmarks might include minimum levels of performance required for the biosecurity system to be considered healthy, or thresholds required to be considered good practice.<sup>153</sup>

4.41 It also recommended creating a performance narrative that allows stakeholders to form a view on system health.<sup>154</sup>

4.42 In Auditor-General Report No.42 2020–21 *Responding to Non-Compliance with Biosecurity Requirements*, the ANAO found that the department did not have formalised internal performance measures on the effectiveness or efficiency of its overall regulation of biosecurity. Measures or management-level reporting for individual pathways were often incomplete or disjointed, limiting the department’s ability to facilitate a view of the effectiveness or efficiency of the regulation of biosecurity as a whole. The department agreed to establish a performance framework for its biosecurity regulation by 1 July 2022, that would:

- include internal and external measures of effectiveness and efficiency for each biosecurity pathway and the biosecurity system as whole;
- identify how performance measures will be used to inform the department’s regulation;
- ensure staff and executive training is undertaken on the requirements of the Commonwealth performance framework; and
- establish how information management issues will be managed to ensure appropriate performance information is available.<sup>155</sup>

4.43 In order to understand the quality of its biosecurity intervention activity, the department inspects material that has passed through the border in the traveller and mail pathways (end point surveys) and cargo pathway (cargo compliance verification), and conducts audit activities (a function that is undertaken outside BOD) to determine leakage of biosecurity risk material across the border. Sampling levels for these programs are statistically determined using quantitative models developed by CEBRA.

4.44 The department has not developed a consolidated report that provides information on the potential leakage of biosecurity risk material against each pathway and in each location. There are no post entry verification activities undertaken for the Maritime pathway. There are no reports that link workforce allocation, location, or competencies to risk.

4.45 The number of Cargo Compliance Verification (CCV) processes are reduced when the workforce is under pressure (see paragraph 2.48). According to the CCV Annual Report, during 2022–23, 25 per cent of the 5,444 CCV consignments referred for inspection in New South Wales and Victoria were inspected. Of those not subjected to CCV inspections, 74 per cent were not

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153 *ibid.*, p. xiii and p. 68.

CEBRA has stated that given the complexity of the biosecurity system and the number of participants it is not well placed to define benchmarks or performance targets. It recommended that these should be defined by participants and stakeholders who understand the constraints of the biosecurity system and to support broad stakeholder acceptance.

154 *ibid.* p. 68.

155 Auditor-General Report No.42 2020–21, *Responding to Non-Compliance with Biosecurity Requirements*, ANAO, Canberra, 2021, paragraph 2.93, available from <https://www.anao.gov.au/work/performance-audit/responding-to-non-compliance-biosecurity-requirements> [accessed 21 February 2025].



completed due to there being no inspection resources available.<sup>156</sup> The 2023–24 inspection rate was expected to be similar to the 2022–23 inspection rate. A ‘small number’ of CCV inspections in Queensland were also cancelled due to a lack of resources. On 19 December 2024, the department advised the ANAO that the CCV Annual Report for 2023–24 is expected to be finalised in Quarter 1 2025.

4.46 The limited and inconsistent collection of CCV data negatively impacts the ability of this activity to provide a clear indication of the impact of biosecurity operations, or an understanding of residual and relative risk that could be used to inform or validate the department’s resourcing, workforce priorities and resource allocation, and to provide stakeholders with confidence in the impact of the system. There is currently no other divisional or departmental level reporting that consolidates data from all pathways, or from other relevant groups or divisions that provides a holistic view of the impact of the biosecurity workforce.

### Recommendation no. 7

4.47 The Department of Agriculture, Fisheries and Forestry generate a framework to inform both operational workforce allocations and long-term strategic planning for workforce resource requirements, based on the impact of biosecurity operations and residual risk. This framework should:

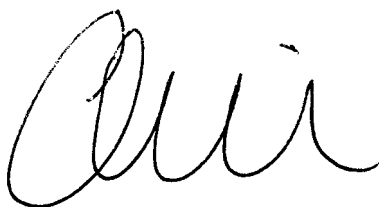
- (a) support an understanding and assessment of the changing biosecurity risk environment;
- (b) include consistent collection of biosecurity data, across all pathways; and
- (c) link workforce allocation to risk.

**Department of Agriculture, Fisheries and Forestry response:** *Agreed.*

4.48 *This recommendation will support the department’s understanding and assessment of the evolving biosecurity risk environment and assist in informing pathway effectiveness and resourcing requirements.*

4.49 *The department will undertake further work on workforce allocation and strategic planning for resourcing requirements.*

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Dr Caralee McLiesh PSM  
Auditor-General

Canberra ACT  
16 April 2025

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<sup>156</sup> Of the remaining one per cent, 17 consignments (0.3 per cent) were cancelled due to work health and safety issues and 12 consignments (0.2 per cent) were also cancelled due to out of zone location of the consignments. These figures are impacted by rounding.



# Appendices

## Appendix 1 Entity response



Australian Government  
Department of Agriculture,  
Fisheries and Forestry

ADAM FENNESSY PSM  
SECRETARY

02 April 2025

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Dear Dr McLiesh

*Caralee,*

Thank you for your email of 6 March 2025 regarding the Australian National Audit Office's proposed audit report - *Delivery of the biosecurity workforce*, and for the opportunity to respond to the report.

Pursuant to section 19 of the *Auditor-General Act 1997*, the Department of Agriculture, Fisheries and Forestry has prepared a response to the report for your consideration.

The Department of Agriculture, Fisheries and Forestry (the department) welcomes the findings of the ANAO and is committed to implementing the report's seven recommendations appropriately and in a timely manner.

The recommendations focus on strengthening workforce planning, resource allocation, benefits management, record keeping, and reporting. As import volumes rise and the biosecurity risk environment continues to evolve, the department recognises the critical role that these business functions play in managing biosecurity risks. The department is committed to understanding the systemic issues that could limit our effective delivery of the biosecurity workforce. The ANAO findings, therefore, provide valuable insights that will support ongoing efforts to enhance effective and efficient management of the biosecurity workforce and regulatory capability uplift initiatives.

We will continue to improve processes that support the biosecurity workforce and broader management of biosecurity risks. Work is already underway across the department to address several elements of the recommendations and to leverage identified opportunities for improvement. The department remains committed to driving positive change through the Transformation Action Plan, other departmental strategic initiatives, and enhanced Biosecurity, Operations and Compliance Group operating models.

Please find enclosed with this letter the department's response to the recommendations and suggested editorial changes.

Kind regards

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## Appendix 2 Improvements observed by the ANAO

1. The existence of independent external audit, and the accompanying potential for scrutiny improves performance. Improvements in administrative and management practices usually occur: in anticipation of ANAO audit activity; during an audit engagement; as interim findings are made; and/or after the audit has been completed and formal findings are communicated.
2. The Joint Committee of Public Accounts and Audit (JCPAA) has encouraged the ANAO to consider ways in which the ANAO could capture and describe some of these impacts. The ANAO's corporate plan states that the ANAO's annual performance statements will provide a narrative that will consider, amongst other matters, analysis of key improvements made by entities during a performance audit process based on information included in tabled performance audit reports.
3. Performance audits involve close engagement between the ANAO and the audited entity as well as other stakeholders involved in the program or activity being audited. Throughout the audit engagement, the ANAO outlines to the entity the preliminary audit findings, conclusions and potential audit recommendations. This ensures that final recommendations are appropriately targeted and encourages entities to take early remedial action on any identified matters during the course of an audit. Remedial actions entities may take during the audit include:
  - strengthening governance arrangements;
  - introducing or revising policies, strategies, guidelines or administrative processes; and
  - initiating reviews or investigations.
4. In this context, the below actions were observed by the ANAO during the course of the audit. It is not clear whether these actions and/or the timing of these actions were planned in response to proposed or actual audit activity. The ANAO has not sought to obtain assurance over the source of these actions or whether they have been appropriately implemented.

**Table A.1: Improvements observed by the ANAO**

Date	Improvement	Paragraph number
December 2024	Workforce Strategy 2024–27 and Workforce Planning Framework published.	2.6
October 2024	Biosecurity, Operations and Compliance Group tactical workforce plan approved by the Deputy Secretary.	2.11
August 2024	PEQ commenced planning for a 10-year strategy.	2.36
November 2024	The conveyance pathway commenced bi-monthly change implementation planning.	2.45
July 2024	The working group for the biosecurity officer mobility program was convened.	2.67
January 2025	Removed outdated Business Continuity plans from the intranet.	2.95
December 2024	Improvements to the horticulture DSM implemented.	3.36
September 2024	PEQ commenced a project to update work instructions for cats and dogs.	3.37

Date	Improvement	Paragraph number
October 2024	Early planning is underway to review and update PEQ plant related DSM.	3.37
October 2024	PEQ is seeking to re-establish a formal verification process as a part of its competency framework, with an intent to complete this implementation by 24 December 2025.	3.95
November 2024	The department added a record of competencies held prior to 2022 to the National Competency Tracker.	3.96
March 2024	Agreement to establish a group to consider how the RSO tool may be used more effectively.	3.101
December 2024	Phase One of TAP reporting project has been delivered with the development of an integrated data model based on Aurion data, and release of enhanced workforce reports.	4.8
September 2024	MAPS was fully replaced by TAMS.	Appendix 3

## Appendix 3 Systems that collect data on the activities and delivery of its biosecurity workforce

Systems	
Import systems	
Agricultural Import Management System (AIMS)	AIMS is the main import application used by the department. It supports the department to manage risks and record actual biosecurity actions for individual consignments of imported cargo, including issuing notices or directions in AIMS to importers and agents.
Aircraft Disinsection Information (ADI) <sup>a</sup>	ADI provides up-to date information regarding Residual (RD) or Pre-embarkation disinsection (PED) certification of international aircraft arriving into Australia. Airline operators are responsible for updating ADI. This information assists departmental officers when assessing whether to attend the arrival of an aircraft.
Biosecurity Import Conditions System (BICON)	BICON holds about 44,000 unique biosecurity risk management plans. There are internal and external versions of this system. The internal system supports the department's assessment and inspection officers to check import conditions and import permits, assess documentation and for onshore management of imported goods. The external version allows individuals and industry clients to search for import conditions related to their commodity and apply for and manage import permits.
Biosecurity Integrated Information System (BIIS) Portal	<p>BIIS is a portal that integrates and provides easy access to the department's biosecurity applications and helps in the management of biosecurity risks. It will only display the applications that are open to everyone or that a staff member has been granted access to. Systems that BIIS provide access to include:</p> <ul style="list-style-type: none"> <li>• Import Management System (IMS);</li> <li>• Approved Arrangements (AA);</li> <li>• Fit and Proper Person (FPP);</li> <li>• Pest and Disease Repository (PDR);</li> <li>• Biosecurity Assessment Recording System (BARS); and</li> <li>• Threat and Risk Management (TRM).</li> </ul>
Cargo Online Lodgement System (COLS)	<p>COLS is for customs brokers and commercial importers to:</p> <ul style="list-style-type: none"> <li>• lodge documents for imported cargo online;</li> <li>• check the status of lodgements in real time;</li> <li>• request a directions re-issue for their lodgement;</li> <li>• retain electronic records of their lodgements; and</li> <li>• receive consistent and priority-based processing.</li> </ul>
Cargo Workload Management System (CWMS)	Cargo importers lodge import documents COLS for assessment by the department prior to goods arriving in Australia. Cargo assessments staff access this documentation through CWMS.
eCert	<p>eCert allows government agencies to exchange importing and exporting government certificates electronically. These electronic certificates (eCerts) contain the same information as a paper government certificate.</p> <p>Australia uses eCert to exchange phytosanitary certificates for plant and plant-related products and sanitary certificates (also known as health and/or veterinary certificates) for animal and animal-related products.</p>

Systems	
Cisco	Cisco supports the management of the assessments team and the Client Contact Group (who support telephone, compliments and complaints and inspection scheduling/booking services) teams' workload management.
Incident	Incident provides basic laboratory and pest and disease tracking for samples lodged by biosecurity officers that require identification.
Mail and Passenger System (MAPS)	MAPS was used at international airports, seaports and mail centres to record outcomes of traveller and mail inspections where biosecurity risk material was detected and required biosecurity action. MAPS was fully replaced by TAMS from 30 September 2024.
Maritime and Aircraft Reporting System (MARS)	MARS is for the pre-arrival reporting, assessment, and management of commercial vessels, non-commercial vessels and aircraft. All conveyances must comply with the required reporting obligations under section 193 and 194 of the <i>Biosecurity Act 2015</i> .
Quarantine Premises Register (QPR)	QPR is a register of quarantine premises where AIMS directions are carried out.
Post Entry Biosecurity System (PEBS)	PEBS is used to manage reservations for cats, dogs, horses and plants needing post-entry quarantine at PEQ.
S-Cargo	S-Cargo is an internal system managing holds on imported sea containers from the high risk Country Action List. <sup>b</sup>
Seasonal Pest	Seasonal Pest helps to manage the biosecurity risk of seasonal hitchhiker pests.
Scheduling and Workload Management System (SWMS)	SWMS manages the scheduling and booking of inspections requested by clients once they have been directed by the department and provides information to inspectors in the field about the inspection bookings.
Traveller and Mail System (TAMS)	TAMS integrates and streamlines automated processes to identify travellers and mail of interest and detect biosecurity risks. TAMS fully replaced MAPS on 30 September 2024.
Vessel Management System (VMS)	VMS is the legacy system for tracking movement and inspection activities of international vessels around Australia. The rollout of MARS in 2016 has mostly replaced the functions of VMS, however VMS is still used for all non-commercial vessels (yachts) visiting Australia and commercial vessels moving between external territories and the Australian mainland.
Import Management System (IMS)	The IMS allows officers to view or process self-assessed clearances (SAC). SACs are low value goods (valued at AUD \$1,000 or less) being brought into Australian territory by air or sea.
Externally managed systems	
Integrated Cargo System (ICS)	The ICS is managed by the Department of Home Affairs. It is the system for the management of imports and exports. The system accepts information provided by importers and exporters as well as transport and logistics service providers and provides authority for cargo movement and clearance. Legislation relevant to the ICS and the various messages processed by it is set out in the <i>Customs Act 1901</i> .

Systems	
Corporate systems	
Aurion	Aurion is the department's Human Resources Management Information System (HRMIS). Aurion is used by all staff, including external workforce, to manage their personal information, position details, reporting lines and complete Aurion-based forms. APS staff use Aurion ESS to manage leave, pay details, performance management and timesheets.
eRecruit	eRecruit is a system for the online management of recruitment and selection processes.
Learnhub	Learnhub is the department's learning management system, where staff can complete training online, register for face to face or face to screen training, record training outcomes and access LinkedIn Learning. Courses available on Learnhub have been developed by the department and by other Australian Government entities. Departmental business areas develop and present training on Learnhub to support staff to understand internal processes and compliance requirements.
TechnologyOne	TechnologyOne is the department's official financial management information system.
Content Manager (CM) and RM Workspace	CM is the department's records management system.
Instructional Material Library (IML)	IML holds the department's instructional material (see paragraph 3.30).

Note a: For more information on disinsection, see Department of Agriculture, Fisheries and Forestry, *Aircraft disinsection* [Internet], DAFF, Canberra, 2024, available from <https://www.agriculture.gov.au/biosecurity-trade/aircraft-vessels-military/aircraft/disinsection> [accessed 1 December 2024].

Note b: For more information on the Country Action List, see: Department of Agriculture, Fisheries and Forestry, *Country Action List* [Internet], DAFF, Canberra, 2024, available from <https://www.agriculture.gov.au/biosecurity-trade/import/arrival/pests/cal> [accessed 1 December 2024].

Source: ANAO analysis of department documents and publicly available information.